

SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT – SITE SELECTION PAPER 2 – METHODOLOGY FOR SITE SELECTION

REPORT OF: DIVISIONAL LEADER FOR PLANNING AND ECONOMY
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Wards Affected: All
Key Decision: Yes
Report to: Scrutiny Committee for Communities, Housing and Planning
Date of meeting: 21st November 2018

Purpose of Report

1. The Council is currently preparing a Site Allocations Development Plan Document (DPD). To inform the preparation of the Site Allocations DPD, a methodology for site selection has been developed. The purpose of this report is to provide an opportunity for the Committee to consider this methodology.

Summary

2. This report:
 - a) Sets out the proposed Site Selection Methodology;
 - b) Sets out the work undertaken to date to prepare the Site Selection Methodology, including consultation with other parties;
 - c) Confirms the number of dwellings the Site Allocation Development Plan Document will seek to allocate; and
 - d) Outlines the ongoing work programme.

Recommendations

3. **That the Scrutiny Committee for Communities, Housing and Planning:**
 - i. **Considers and comments on the proposed Site Selection Methodology;**
 - ii. **Authorises the Divisional Leader for Planning and the Economy, in consultation with the Cabinet Member for Planning, to make any further necessary minor amendments to the proposed methodology, if required;**
 - iii. **Notes the Site Allocations Development Plan Document will seek to allocate up to 2,500 dwellings, in accordance with District Plan policy DP4; and**
 - iv. **Notes the work programme.**
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Background

4. At the District Plan Examination, the Council committed to preparing a Site Allocations Development Plan Document (DPD), which will allocate sites to provide the residual housing requirement of approximately 2,500 homes (identified in DP4:Housing), to meet the Council's full housing need over the Plan period to 2031.
5. At its meeting in January 2018, this Scrutiny Committee considered the work programme required to develop the Site Allocations DPD, updated Members on the call for sites and the resultant Strategic Housing Land Availability Assessment (SHELAA) and agreed that the next stage was to assess whether the sites promoted meet the adopted District Plan Strategy. A Member Working Group was set up to oversee this work.
6. In September 2018, Scrutiny Committee considered the conclusions of the Site Selection Paper One – Assessment of Housing Sites against District Plan Strategy. This report also noted that the next stage of work would be to develop the site selection methodology, against which the remaining sites would be assessed. The purpose of the Site Selection Methodology is to provide a clear process for selecting the most suitable and sustainable sites for inclusion in the Site Allocations Document.
7. Officers have prepared a draft Site Selection Methodology which they have discussed with the Site Allocation Member Working Group.

Site Selection Methodology

8. The Site Selection Methodology sets out the criteria that have been developed to establish the suitability, availability and deliverability of each site. This includes relevant land designations, constraints, accessibility to services, infrastructure and transport. There are 17 criteria for the housing sites and 19 for the employment sites.
9. The criteria have been designed to enable a comparison of sites against one another with the aim of determining the most sustainable and developable in accordance with the National Planning Policy Framework, which will ensure selection is consistent with the principles of sustainable development and consistent with the policies within the Framework.

Consultation process

10. Following agreement from the Working Group, officers consulted the following groups on the revised draft Methodology for Site Selection:
 - a) The Mid Sussex Developer Liaison Group – a meeting was held on 3rd October 2018. There were 15 attendees, representing landowners, development companies, land promoters and registered housing providers.

b) Neighbouring Authorities - The draft Methodology was sent to planning officers at Crawley Borough Council and Horsham District Council as neighbouring authorities in the North West Sussex housing market area. Authorities in the functional economic market area including Brighton and Hove Council, Adur and Worthing Council and Eastbourne and Lewes Council were also given the opportunity to comment on the methodology. Neighbouring authorities of Wealden and Tandridge were also given opportunity to comment.

c) Town and Parish Councils – a meeting was held on 8th October 2018. Representatives from 17 Town and Parish Councils were represented at the briefing.

11. All consultees were given the draft Methodology to review, and were asked to submit comments. Consultees were advised that if no response was submitted, it would be taken that they had no objections to the proposed methodology.

Summary of Responses

12. Feedback was received from a number of respondents; 2 from the development industry, 2 from adjacent Local Authorities, 6 from Town and Parish Councils and 1 on behalf of local residents.
13. Appendix 2 sets out the comments received, and identifies where these have resulted in changes to the Methodology. Many of the comments have resulted in clarifications to the methodology or the criteria, and further information has been included on the sources of data which will be used in the assessment process.

DP4 Housing – Residual Amount

14. A number of the consultation responses received referred to the number of dwellings that the Site Allocations Document is seeking to allocate, including suggestions that the number should be higher or lower than the amount set out in policy DP4 Housing.
15. District Plan policy DP4: Housing sets out the sources of housing supply that will deliver the total housing requirement, as at 1st April 2017. The policy indicates that 2,439 dwellings are to be delivered 'Elsewhere in the District, as allocated through future Neighbourhood Plans and the Site Allocations Document'. It is acknowledged that this residual amount will have changed due to new permissions granted and dwellings completed. However, it is recommended that the Site Allocations Plan still seeks to allocate land for around 2,500 dwellings.
16. There are a number of reasons for this:
 - a) There are a number of allocations from the Mid Sussex Local Plan (2004), Small Scale Housing Allocations DPD (2008) and various Neighbourhood Plans that have yet to secure a planning permission. Officers are currently seeking to make contact with the landowners/developers to establish the longer term intentions for these sites, with the intention of reviewing these allocations as part of the preparation of the Site Allocations Plan. In light of the time elapsed since some of these sites were allocated, it is prudent to review whether these sites are still available for development. Following this, it is possible that further sites will be required to replace these sources of supply. It is important to note that none of these sites contributes to the Council's 5 year housing land supply calculation.

b) The Northern Arc Infrastructure Delivery Plan (2018) indicates that the delivery of 700 units, out of a total of 3,500 units, will fall outside the Plan period, i.e. post 2031.

c) The housing requirement figures in the District Plan are a minimum. Consistent with the principles of the NPPF, (para 59), 'To support the Government's objective of significantly boosting the supply of homes', it is prudent that the District Plan policy framework allocates more than the figure indicated in the policy.

17. Therefore, to ensure that the Council will be able to maintain a deliverable supply of homes to meet its identified housing need, it is considered appropriate to plan for the delivery of up to 2,500 dwellings through the Site Allocations Plan.
18. It is important to note that the delivery of 2,500 dwellings units will be subject to the Council being able to demonstrate that this level of housing growth would not cause further harm to the integrity of the Ashdown Forest SAC. The Habitats Regulations Assessment will be a key part of the evidence base going forward.

Next Steps

19. Following Scrutiny Committee comments, over the coming months, officers will use the Methodology to undertake the site assessment work. This will involve liaison with experts in specialist fields to inform the conclusions of the assessment work. Officers will also continue to discuss the emerging work with Town and Parish Council and will liaise closely with those Parishes where there is a potential conflict with Neighbourhood Plans.
20. Officers will continue to liaise with site promoters and landowners where required, to gather further information about the site. To facilitate this, a questionnaire has been sent to all landowners/agents/site promoters with the aim of establishing when a site is likely to be available for development and what infrastructure would be delivered as part of the development. The feedback from this will be used to inform the site selection templates. A copy of the questionnaire is attached at Appendix 3.
21. Officers will continue to work with the consultants appointed to undertake the Transport Assessment, Air Quality and Habitats Regulations Assessment Work.
22. Officers will provide a further update to the Committee on the Site Allocations DPD work in the Spring 2019.

Financial Implications

23. Commissioning consultants to carry out transport modelling, air quality assessment and Habitats Regulations Assessment has financial implications and these costs have been budgeted for.

Risk Management Implications

24. If a robust and detailed assessment of the sites is not undertaken, the inclusion or exclusion of sites from the Sites Allocations DPD will be challenged at the DPD Examination and risk it not being adopted in a timely manner. The Site Allocations DPD will identify housing and employment sites which will enable the Council to demonstrate a five year housing land supply; without this document in place, the Council will be vulnerable to speculative planning applications. The allocation of additional employment sites will make an important contribution to the delivery of Economic Development Strategy.

Equality and Customer Service Implications

25. It is important that the Council allocates sites for housing and employment to maximise accessibility for all to decent housing and employment opportunities. An Equality Impact Assessment will be prepared alongside the Site Allocations DPD to ensure opportunities to promote equality and/or barriers to service are considered and addressed.

Other Material Implications

26. There are no other material implications.

Appendix 1: Site Selection Paper Two – Methodology for Site Selection

Appendix 2: Summary of responses to the Site Allocations – Site Selection Methodology

Appendix 3: Developer Questionnaire

Background papers

Previous Committee reports and Site Selection paper one.