

Consideration of Options to Strengthen the Five Year Housing Supply

1. In his concluding comments to the District Plan Examination on 26th July 2017, the Inspector identified that the Council has a 5.2 year housing land supply. The Inspector noted that the housing land supply is not 'hugely comfortable', and that the Council should consider how its five year position could be strengthened.
2. The District Council has committed to start work on a Site Allocations DPD immediately, to be adopted in 2020. The aims of the Site Allocations DPD will be to secure supply for the rest of the plan period, and maintain a five year housing land supply. The options presented to strengthen the five year supply are therefore focussed on the short-term (next 2 years), prior to the Allocations DPD being adopted.

Mechanisms Considered

3. Officers have assessed the policies within the District Plan to see whether alternative wording or policy criteria could strengthen the five year supply position, or whether another approach is required. Following this review, the following two approaches were considered to be the most realistic:
 - Option 1: Amend policy DP6: Settlement Hierarchy, to increase the acceptability threshold for 'windfall' development on the edge of settlements (contiguous with the built-up area boundary). Currently the policy supports growth of settlements where development is for fewer than 10 dwellings, however this could be raised to (say) 20-25 dwellings.
 - Option 2: Allocate a further Strategic Site that could deliver in the short-term and contribute directly to the five year supply.

Consideration of Options

Option 1: Amend DP6: Settlement Hierarchy

4. DP6: Settlement Hierarchy currently states:

“...the expansion of settlements will be supported where:

- 1. The site is allocated in the District Plan, a Neighbourhood Plan or subsequent Development Plan Document or where the proposed development is for fewer than 10 dwellings; and*
- 2. The site is contiguous with an existing built up area of the settlement; and*
- 3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.*

...”

5. One option would be to raise the threshold of 10 dwellings to 25¹, in order to boost supply – particularly in the first five years.
6. Paragraph 47 of the NPPF requires local plans to identify deliverable sites to provide a 5 year supply. To be deliverable a site needs to be available now and achievable with realistic prospect of delivery. The SHLAA only shows a very limited number of deliverable/developable sites that are contiguous with the built-up area and under a 25 dwelling threshold – therefore an amendment of the threshold is not likely to significantly boost supply in the first five years. In addition it could have further unintended consequences.

¹ An increase to a threshold of 25 units is judged to be a number that could more significantly boost supply compared to the previously published 10 dwelling threshold.

7. The current threshold of 10 dwellings is seen as small-scale in the context of all settlements within the District. A threshold of 25 dwellings would be considered a large development in the context of some settlements; particularly those in categories 3, 4 and 5 of the settlement hierarchy.
8. An increase to the threshold would also encourage developments to bypass the Site Allocations DPD or Neighbourhood Plan processes, as the site would be supported in policy terms. This could lead to unplanned windfall development of a relatively large scale at sensitive locations and not allow for development to be planned holistically with (for example) infrastructure. This does not accord with the plan strategy or aims.
9. The raising of the dwellings threshold would not meet the tests set out in the NPPF with respect to the five year supply, and could not be relied upon to improve the five year supply. It is not a sufficiently robust guarantee that sites will be brought forward; and if they are, the timescale for doing so is unknown. Therefore, the Council does not see this as a mechanism that would make the five year supply more comfortable.
10. Paragraph 48 of the NPPF states that LPA's can make an allowance for windfall sites in the 5 year supply if there is compelling evidence. Policy DP5: Housing includes a windfall allowance of 45 units per year from year 6+ onwards, on sites of less than 6 units. The provisions in DP6: Settlement Hierarchy that enable small scale urban extension of up to 10 units is likely to provide some windfall development both in the first 5 years of the Plan and from year 6 onwards. However, this policy is yet to be adopted and the number of additional units this source of supply will generate is unknown, but over time (through the monitoring of this policy) the Council could be able to justify such an allowance in the future.
11. To provide greater certainty to the community the Council considers that the 5 year supply will be more robust with an additional site allocation rather than to rely on speculative development through the application of a revised policy DP6, whether at up to 10 units or a higher amount. The Council will be in a better position to secure the necessary infrastructure required to support development through a Plan led development, rather than through the development of (potentially) multiple smaller sites.

Option 2: Allocate a further Strategic Site

12. The Council assessed a range of strategic site options for allocation within the District Plan during its preparation. These were assessed primarily within the SHLAA (EP27), the Sustainability Appraisal (BP5) and the Strategic Site Selection Paper (EP23). These considered suitability, availability, achievability and sustainability. The Strategic Site Assessment Paper drew the findings of the SHLAA and SA together to give a comprehensive assessment of the merits of the strategic site options put forward.
13. The Strategic Sites that were assessed were:
 - A)** Land to the North of Burgess Hill (known as the 'Northern Arc') – approx. 3,500 dwellings. SHLAA ref: #493
 - B)** Land to the East of Burgess Hill (East of Kings Way) – approx. 500 dwellings. SHLAA ref: #233
 - C)** Land to the South of Burgess Hill (South of Folders Lane) – approx. 1,000 dwellings SHLAA ref: #557
 - D)** Land to the West of Burgess Hill (West of Jane Murray Way) – approx. 1,500 dwellings. SHLAA ref: #740
 - E)** Land to East/South of Crawley (Crabbet Park) – approx. 2,300 dwellings. SHLAA ref: #18

- F)** New Market Town (Sayers Common area) – approx. 10,000 dwellings. SHLAA ref: #678
- G)** Land North of Cuckfield Bypass (Cuckfield) – approx. 500 dwellings. SHLAA ref: #240
- H)** Land adj. Great Harwood Farm (East Grinstead) – approx. 600 dwellings. SHLAA ref: #17
- I)** Land north east of Lindfield (Lindfield) – approx. 1,200 dwellings. SHLAA ref: #498
- J)** Land east of Northlands Brook and south of Scamps Hill (Lindfield) – approx. 500 dwellings. SHLAA ref: #483
- K)** Haywards Heath Golf Course (Haywards Heath) – approx. 500 dwellings. SHLAA ref: #503
- L)** Eastlands, Lewes Road (Scaynes Hill) – approx. 630 dwellings. SHLAA ref: #515
- M)** Hardriding Farm, Brighton Road (Pease Pottage) – approx. 600 dwellings. SHLAA ref: #666
- N)** Land South of Pease Pottage (Pease Pottage) – approx. 660 dwellings. SHLAA ref: #603
- O)** Land at Lower Tilgate (Pease Pottage) – approx. 1,750 dwellings. SHLAA ref: #243
- P)** Broad Location North and East of Ansty – approx. 2,000 dwellings. SHLAA ref: #736
- Q)** Imberhorne Farm, East Grinstead – approx. 550 dwellings. SHLAA ref: #770

14. The evidence base showed that the following sites were the Council's preferred options due to their suitability and deliverability. Those sites were:

- A)** Northern Arc, Burgess Hill (DP9)
- B)** Kings Way, Burgess Hill (DP8)
- M)** Hardriding Farm, Pease Pottage (DP9a)

15. All other sites were rejected due to:

- Issues that would cast doubt on deliverability, particularly in the short-term
- Environmental constraints
- Infrastructure constraints, with no suggested feasible/viable mitigation
- Site not being actively promoted, therefore no realistic prospect of delivery

16. During the examination hearings, the Council defended these evidence based assessments and the conclusions reached regarding strategic sites. The Council believe that a robust assessment and justification of the sites chosen and rejected was carried out. Following a re-assessment of the evidence base documents since the hearings concluded, the position in terms of the sites chosen (DP8, DP9 and DP9a) and sites rejected (and reasons for rejection) has not changed.

17. The Council has made it clear that its 'call for sites' for landowners/agents to promote new sites is always open. A site, 'Land north of Clayton Mills' was promoted to the Council in July 2017 and the SHLAA was updated accordingly (site reference ID: 753). Part of the site had already been identified as a potential housing site in the draft Hassocks Neighbourhood Plan for 140 homes.

18. Officers have reviewed the technical information regarding this site, alongside all other strategic site options. This included a re-appraisal within the Sustainability Appraisal to include this site (listed as option **(R)**) and a redraft of the Strategic Site Selection Paper (EP23a). This work concluded that land north of Clayton Mills is the only strategic site that, at this time, is deliverable (i.e. is available now, offers a suitable location for development now and can deliver new homes within the next 5 years) and performs well in sustainability terms.
19. On the basis that Option 1 does not provide a robust or secure mechanism to improve the five year supply position, the Council proposes to allocate this further strategic site for 500 dwellings. It is proposed this draft allocation will be submitted as a Main Modification in order to strengthen the supply of housing, in particular the five year supply. It will be subject to the Main Modifications consultation alongside other Main Modifications proposed to ensure the District Plan is 'sound'. The Habitats Regulations Assessment and Sustainability Appraisal will also be subject to consultation.

Land north of Clayton Mills, Hassocks

20. The Hassocks Neighbourhood Plan (not yet examined) proposes an allocation of a site north of Clayton Mills, Hassocks, for 140 dwellings. The promoter of the site presented a larger scheme to the District Council in July 2017, which would be capable of delivering approximately 500 dwellings.
21. The scheme would be accessed from Ockley Lane. It would also include a site for a primary school, informal recreation area, supporting infrastructure and landscaping.
22. This proposal will provide a comprehensive development of a site that in part has already been identified as a Neighbourhood Plan allocation. The development of the larger site would provide the benefits of:
- It enables a comprehensive scheme to be developed rather than in a piecemeal manner, which results in better planning of the infrastructure required to support the development
 - A scheme that provides a much needed site for a new primary school, as deficiencies in primary provision have been identified within the village
 - A scheme that provides a good relationship with the existing Clayton Mills/Mackie Avenue developments
 - A scheme that can be designed to manage the relationship of the site and the listed building, to ensure that the impact on the listed building is minimised
 - A better access arrangement onto Ockley Lane.

Sustainability Appraisal (SA) – Findings

23. As part of the Sustainability Appraisal - Main Modifications report, an additional assessment of this site has been included:

R) Land north of Clayton Mills, Hassocks – approx. 500 dwellings. SHLAA ref: #753.

24. The SA notes that delivery could be achieved in the short-term which would help meet housing need arising, that the site is well located in terms of existing health and retail/community facilities, and has the potential to alleviate existing shortfalls in primary provision by providing a new primary school on-site. It therefore scores very positively on social objectives.

25. In terms of environmental objectives, there are no environmental designations that would be negatively affected by the development of this site. Similarly, the site is not subject to flood risk. Listed buildings lie adjacent to the site, development would need to respect their setting and no negative impacts are expected. The Stonepound Crossroads Air Quality Management Area (AQMA) is nearby, however initial strategic transport modelling to accompany the District Plan does not predict significant impacts. Mitigation can be provided within the policy to encourage sustainable transport use, the potential to reduce air quality impacts by encouraging electric cars, and for a significant amount of trips to services within Hassocks to be carried out on foot/cycle.
26. In terms of economic impacts, the site scores similarly to other sites of its size, in that it could improve retail facilities within the village by increased footfall from new occupants, would provide an increased workforce and support economic growth.
27. Overall the site scores positively as it would provide social benefits in providing new housing and infrastructure at the same time as having few environmental impacts compared to other sites appraised. It is therefore concluded that this is a sustainable site and scores favourably compared to other options.

Strategic Site Selection Paper - Findings

28. This Strategic Site Selection paper revision concludes that:
29. “The site has a number of major positive impacts – namely that it is largely unconstrained in environmental terms (i.e. it is not adjacent to any designated areas). The site is also expected to incorporate new educational facilities in the form of a primary school, which should alleviate existing education deficits in Hassocks.
30. The site is being actively promoted and is able to deliver housing within the first 5 years of the plan period.
31. Overall, there are a number of significant positives associated with this site which outweigh any negatives related to its landscape setting and potential highways impacts. The development of a comprehensive masterplan with association landscaping and new infrastructure will reduce any negative impact that may arise from the site’s development and will ensure that the highway network is capable of accommodating the additional traffic generated”.

Other Assessments

32. The potential allocation of this site has been tested through the strategic transport model to assess its impact on the AQMA and road network. Testing has shown that it will not cause a significant impact at Stonepound Crossroads. As part of the policy criteria, it will be expected that the scheme must provide a sound evidence base which demonstrates that it will not cause unacceptable levels of air pollution, and is consistent with the Stonepound Crossroads Air Quality Management Plan. It is also proposed to include a criterion that requires electric vehicle charging facilities to be included (either an electrical socket, or infrastructure provided to enable a dedicated charger to be installed at a later date) to encourage the use of electric cars and thus assist in the reduction of local air pollution.
33. With respect to the Habitats Regulations Assessment, the site has been assessed for its impact on Ashdown Forest SAC in terms of air pollution (particularly nitrogen deposition). Findings from this work indicate the inclusion of this site would not have an impact on Ashdown Forest in combination with other planned development in the District. A revised Habitats Regulations Assessment will be published alongside the Main Modifications.

Updated Position on Other Sources of Supply

34. A number of significant sites are the subject of call-in by the Secretary of State and await determination.

Reference	Site	Units	Inquiry date	Officer rec.	Decision	SoS
AP/16/009 DM/15/0429	Hill Place Farm	up to 200	25/10/16	Refusal	Refusal	Recovered
AP/16/0016 DM/15/3614	West of Turners Hill Road, Crawley Down	44	31/01/17	Permission	Refusal	Recovered
AP/16/0037 DM/15/3979	West of Turners Hill Road, Crawley Down	30	31/01/17	Permission	Resolved to approve	Call-in
AP/16/0040 DM/15/4094	Land south of Hazel Close, Crawley Down	Up to 60	31/01/17	Permission	Resolve to approve	Call-in
AP/16/0038 DM/16/2330	Land south of Hazel Close, Crawley Down	Up to 30	31/01/17	Permission	Resolve to approve	Call-in
AP/16/0055 DM/15/4457	South of Scamps Hill, Lindfield	Up to 200	06/06/17	Permission	Refusal	Recovered
AP/17/0003	Land rear of Friars Oak, London Road, Hassocks	Up to 130	06/06/17	Permission	Resolve to approve	Call-in
AP/13/0007 12/01540/OUT	Kingsland Laines, Reeds Lane, Sayers Common	120 (80 net*)				To be redetermined
Total		714				

*Planning permission granted for 40 units on the site.

35. There are currently sites with a combined capacity of approximately 714 dwellings recovered or called-in. Of these, a total of 190-210 dwellings were originally approved by the Council (allowing for site overlap at Crawley Down). It is likely that some of the applications still at appeal/call-in will be approved, and therefore could make a significant contribution towards the five year supply.

36. Since the last hearing date, planning committees have resolved to approve a further 146 dwellings that would be delivered within the first five years of the Plan. This demonstrates that the Council is taking a proactive approach to housing delivery and taking necessary steps to improve the five year supply position.

37. The allocation of Land north of Clayton Mills, Hassocks plus the additional dwellings with a resolution to approve by Planning Committee, would increase the five year supply position from 5.2 to 5.47 years (equivalent to a surplus of 506 dwellings). This would be improved further by any subsequent approvals of sites currently at appeal/call-in (as shown in the above table).

Other Implications

38. The inclusion of a further strategic site at Land north of Clayton Mills, Hassocks, will have implications for the Hassocks Neighbourhood Plan.

39. The Council are in discussions with the Parish Council and their planning consultant to assess all implications. Initial thoughts are that the Neighbourhood Plan can be amended to remove the allocation of 140 dwellings (as this will now be superseded by the District Council's allocation) and can be re-submitted in accordance with the regulations. It may provide Hassocks Parish Council with the opportunity to redraft some policies in order to reflect the additional site. It can then proceed promptly to examination and subsequent referendum shortly after adoption of the District Plan.

Conclusion

40. The Council proposes to allocate Land north of Clayton Mills, Hassocks as a strategic site capable of delivering 500 dwellings. Approximately 150 of these would be deliverable within the first five years of the plan period. The remaining 350 dwellings will be delivered in the period immediately following the current 5 year period and will contribute towards the total District Plan housing provision – this reduces the residual number of dwellings to be identified within future Neighbourhood Plans and the Site Allocations DPD, so provides more certainty over site delivery now.
41. This will provide security in terms of the five year supply. Without this modification, it was concluded that the District Council would have a 5.2 year supply. This allocation would secure delivery of an additional 150 units within the first five years, which in itself would improve the five year supply to 5.34 years. Approval of further schemes at recent planning committees raises this to 5.47 years. A number of sites currently at appeal/called-in may also be approved, which would improve this position further.
42. This will ensure that the five year supply is more comfortable at least until the point that the Site Allocations DPD is adopted which will ensure a rolling five year land supply. The Council will provide an update on the sites still to be determined and the implications for the five year supply (including a revised Housing Trajectory) once resolved.
43. The District Council believe that the additional allocation, in addition to the sites currently called-in by the Secretary of State or at appeal which are due to be determined shortly, will make the 5.2 years supply position more robust, as requested. This position should be sufficient to ensure a rolling five year supply until the Site Allocations DPD is adopted by 2020, which will improve the position further. The Council propose this is the best and most effective mechanism to improve the five year supply in the short-term.