

Site Selection Methodology Review

Response by WILD

We have the following points to make with regard to the proposed further review of sites.

1. Paras 6/7. The Council should consider whether the timescale set out disadvantages smaller developers/promoters who may not have been present at the examination and will not necessarily be expecting a call for further information, as opposed to those who took part in the hearings and have more resources at their disposal.
2. Para 7. We submitted at the hearings that evaluation should be proportionate. Others pointed out that such an approach should apply to benefits as well as constraints and we agree with that. But we believe the process should guard against disadvantaging smaller developers, or allowing larger sites to be subjected to inadequate scrutiny.
3. Para 7. The re-appraisal should not be geared only to the points made in the bullet points. It may be that this is not intended, but the drafting as it stands is not clear. Our concern is that the original assessment may have been flawed.
4. We understand the point that, in terms of the NPPF, principles 3 and 4 should be given equal weight. However, that was not the basis on which the Plan was made, and it would require the Council to change the spatial strategy to accommodate it. The Council's original logic - to follow the previous strategy until it was clear that it would not provide sufficient housing, and then to adopt principle 4 in addition - is reasonable and not at odds with the NPPF, being at the Council's discretion: in our view the question of equal weight applies at the level of individual site assessment, rather than strategy. A possible adverse outcome of the proposed change to the strategy is that significant sites are favoured simply because they are larger, leading to a pattern of allocations at odds with the characteristics of the district as a whole.
5. Para 10. There is now clarity on where the principal unmet need lies, namely in Crawley, to the north west of the district. It would be helpful to be specific, so that developers and local people can have essential context for the selection choices which will be made.