



MS06: The Selection of Sites for Allocation in the Plan

**Hearing Statement
February 2026**



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6. The Selection of Sites for Allocation in the Plan

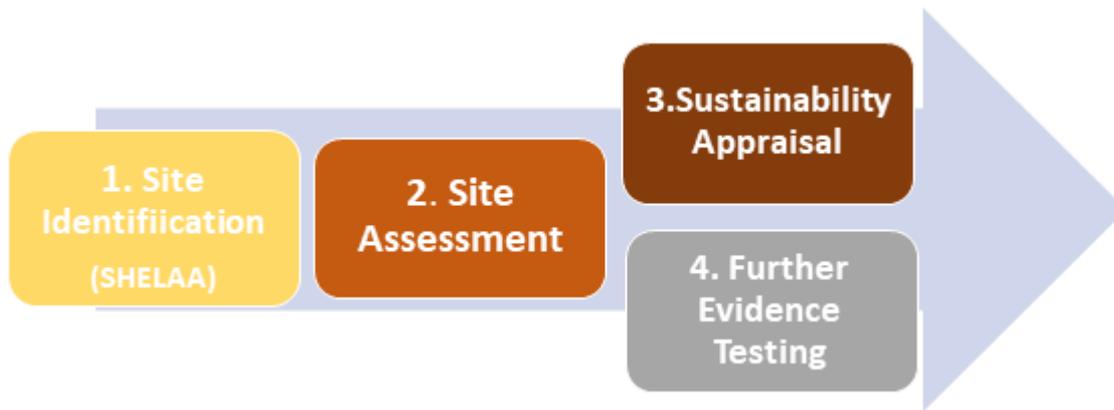
The rationale and effectiveness of the site selection process

a) The soundness of the process which led to the inclusion of site allocations in the plan and the exclusion of other sites, including the consideration of mitigation measures to address constraints

- 6.1. The Council has used a sound approach to the selection of site allocations, through the application of a Site Selection Methodology [SSP1].
- 6.2. The site selection process has been developed to determine the most sustainable and developable sites in accordance with the NPPF. Through its application it ensures the proposed site allocations are consistent with the principles of sustainable development and the requirements of the NPPF and PPG. This approach provides a clear and justified reason for the exclusion of sites which are not consistent with the principles of sustainable development and the requirements of the NPPF and PPG.
- 6.3. Paragraph 73 of the NPPF requires the Council to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites...”.
- 6.4. The PPG states that the assessment of land availability does not in itself determine whether a site should be allocated for development, ...but it [is] for the development plan itself to determine which of those sites are the most suitable to meet those requirements. (ID: 3-001-20190722).

Site Selection Process

- 6.5. The application of the site selection methodology ensures that only those sites as defined by the NPPF as a suitable location for development with a reasonable prospect that they would be available are selected for allocation.
- 6.6. The methodology used for the submitted District Plan is based on the Site Allocations DPD methodology, which the Inspector found to be a sound approach. It was developed in consultation with Town and Parish Councils, Neighbouring Authorities, and the Mid Sussex Developers’ Liaison Group. Comments received from the consultation on the methodology and how the Council responded to these are set out in Appendix 3 of SSP1. The Site Selection Conclusions papers [SSP2 and SSP3] clearly and transparently record the reasons for accepting and rejecting sites.
- 6.7. The methodology for the selection sites for allocation is a 4-step process set out below:



6.8. As set out in SSP1, the step 2 ‘Site Assessment’ is a three-stage process which has been guided by policies in the NPPF and is as follows:

- **2(a) Relationship to Settlements**
- **2(b) Criteria: Showstoppers**
- **2(c) Criteria: Overall Assessment**

6.9. **Stage 2(a)** rejects sites that are isolated from settlements and therefore do not contribute to a sustainable pattern of development. These sites would be reliant on private car use to reach services and facilities, would not align growth and infrastructure, would not support climate change objectives and would therefore not be compliant with paragraphs 11 and 16 of the NPPF.

6.10. The site selection methodology (SSP1, paragraph 22) makes a distinction during the assessment process between ‘significant’ sites (i.e. those capable of delivering 1,000 homes or more) and other sites, as sites of significant scale can act as ‘stand-alone’ settlements supported by on-site infrastructure and service which could enable them to be self-sufficient and deliver sustainable places. All ‘significant’ sites progressed directly onto stage 2(b).

6.11. **Stages 2(b)** and **2(c)** involve assessment of sites against the Site Selection criteria. Stage 2(b) rejects sites that are assessed to contain ‘showstopper’ constraints – i.e. would have a significant impact (assessed as Red – “Very Negative Impact”) against any criterion where the NPPF has clearly stated that development in these areas should be avoided, refused or only permitted in exceptional circumstances. An example of a ‘showstopper’ constraint would be high impact/major development in the High Weald National Landscape. Supplementary evidence ‘Major Development in the High Weald AONB’ [ENV7] has been prepared to inform conclusions on the potential impact of development in the protected landscape.

6.12. Whilst there are no ‘showstopper’ or single reasons to reject sites at **Stage 2(c)**, this stage considers the pros and cons of each site and then weighs these against each other to form a view on the sustainability of each site. It informs the Council’s consideration of adverse impacts when considered against the NPPF as a whole, setting out where the adverse impacts of allocating these sites significantly and demonstrably outweigh the benefits.

- 6.13. **Stage 3** involves in-combination testing including transport modelling, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). Previous stages of the methodology consider sites on an individual basis, Stage 3 allows development scenarios to be tested to assess in-combination impacts. The findings of this in-combination testing informed the collection of sites proposed for allocation in the Submitted District Plan.
- 6.14. The site promoters/developers have been asked to ‘fact check’ the site assessment proformas for accuracy of results during the assessment process. This process provided site promoters with the opportunity to verify quantitative conclusions or note if the assessment has overlooked proximity to a key feature or service which might affect the overall suitability of the site. Promoters of sites that progressed to Stage 2(b) were invited to respond to the Council’s initial site assessment in 2021. A further fact checking exercise was held with promoters who submitted new sites through the Regulation 18 consultation, irrespective of the stage reached. Their and Council responses are set out in Appendix 2 of SSP3.

Consideration of Mitigation

- 6.15. The consideration of opportunities for mitigation is built into the Site Assessment Methodology, as set out in the assessment criteria. When carrying out the initial site assessment a judgement was made about the potential for mitigation. Where required, specialists such as the Council’s Trees and Conservation officers were consulted to inform judgements on mitigation and where additional information was provided by the site promoter (either with a submission or after the fact check stage) these were taken into account. This means that sites are not penalised for constraints which are capable of mitigation.

Table 1: Mitigation

2: Flood risk	Assessment takes into consideration the size of the area that is impacted by flood risk. Sites with small areas within flood zone 2/3, but with potential to deliver the stated yield and avoid those areas, were given a neutral impact in the assessment and not a negative impact.
3: Trees	Where development may cause harm but in the Council’s view mitigation is possible, a neutral impact is given and not a negative impact.
4: Biodiversity	Where development may cause harm but in the Council’s view mitigation is possible, a neutral impact is given and not a negative impact.
5: Listed Building	Where development may cause less than substantial harm to a listed building, but in the Council’s view has potential for suitable

	mitigation then a neutral impact is given and not a negative impact.
6: Conservation Area	Where development may cause less than substantial harm to a Conservation Area, but in the Council's view has potential for suitable mitigation then a neutral impact is given and not a negative impact.
7: Archaeology	A neutral impact is given where development has a moderate impact on an asset but, in the Council's view, that impact can be mitigated.

6.16. The Sustainability Appraisal [DP7] appraised the reasonable alternative sites pre-mitigation and with relevant mitigation. While the site selection process took into account mitigation that could potentially be put in place to overcome constraints, the SA considered mitigation that would be provided through the application of the submission draft Plan policies.

6.17. In addition, due diligence of the deliverability of sites was undertaken such as liaison with site promoter/developers on policy requirements, establishing any legal constraints to site delivery and where appropriate liaising with neighbouring authorities on site specific matters.

Site Selection: Conclusions

6.18. The Council has taken a sound, robust and transparent approach to site selection based on a tested methodology used to inform the preparation of the adopted Site Allocations DPD. Reasons for including and rejecting sites are well documented.

6.19. The Council has not set minimum or maximum housing targets for growth when considering sites it can accommodate and had adopted a 'capacity-led' approach which resulted in more homes being identified during the site selection process than were required to meet the district's own housing needs.

6.20. As set out in [AP-018](#) the aim of the exercise was not only to meet the district's local housing need and was not carried out with any target figure in mind. The exercise was to identify a pool of suitable sites by which the Council could allocate to meet Mid Sussex need and unmet need arising elsewhere.

6.21. Further details on the Council's approach to unmet needs is set out in response to Matter 2; and the spatial strategy, apportionment and distribution of growth in response to Matter 5.

b) The rationale behind the selection of the strategic and larger site allocations

6.22. The selection of the strategic and larger sites has been influenced by a number of factors.

This includes the availability of sites, conclusions of the site selection process and delivery of the Plan strategy.

Strategic Housing and Economic Land Availability Assessment

6.23. The Strategic Housing and Economic Land Availability Assessment (SHELAA) [SSP5] provides the pool of sites which have been tested through the site selection process.

6.24. The SHELAA contains 272 housing sites. These are made up of sites:

- submitted to the Council during formal Call for Sites exercises
- submitted to the Council outside formal Call for Sites exercise (noting the Council operates an organic ‘always open’ approach)
- identified by the Council, including its own landholdings
- submitted to the Council as part of a representation at Regulation 18/19 consultation. Sites submitted at Regulation 19 were assessed, but none were suitable for allocation. The additional sites were included in the 2024 SHELAA [SSP3].

6.25. The SHELAA contains sites with a yield of 5+ dwellings with no upper limit. Sites are classified as follows. The pool of sites is heavily weighted towards small-scale sites, with only 20 sites (7%) above 300 dwellings. (The threshold for large scale sites was selected because this is the scale of site that can begin to deliver on site infrastructure, but this is not material in the assessment of medium or large scale sites). The pool of sites has influenced the range of sizes of sites that were available to allocate.

Table 2: SHELAA Mix

Classification	Approximate Yield (dwellings)	Number of Sites for consideration
Small Scale	5 – 49	148
Medium Scale	50 – 299	104
Large Scale	300 – 999	14
Significant	1,000+	6
	TOTAL	272

6.26. These sites were subject to the Site Selection Process which is described above and in the Site Selection Methodology [SSP1].

Selection of Strategic Allocations (Significant Sites)

6.27. The Council's response to Matter 5 and Chapter 6 of the submission District Plan explain that the pool of sites in the SHELAA was not sufficient to meet the housing requirement through the continued expansion of existing settlements which was the spatial strategy in the adopted District Plan. In addition, as settlements expand, sites on the edge become further away from the town and village centre, making these sites less sustainable, without the scale of development to generate a step change in sustainable transport and infrastructure needed to improve sustainability.

6.28. Therefore, an alternative approach was required, hence the inclusion within the strategy of a new principle "Opportunities for extensions, to improve sustainability of existing settlements". This revised approach delivers development at a scale where there is opportunity for on-site infrastructure and potential for 20-minute neighbourhood principles to be delivered.

6.29. The Site Selection methodology [SSP1] explains (para 19) that, whilst all sites reaching stage 2(b) onwards were assessed against the site selection criteria, additional scrutiny and due diligence was carried out for "Significant Sites" i.e. those over 1,000 dwellings. This was due to the larger scale of these sites and their greater infrastructure requirements including provision of on-site infrastructure and phasing. A questionnaire was sent to promoters of these sites in September 2021 to establish details on the assumptions behind anticipated delivery rates, identified major on-site and off-site infrastructure requirements, engagement with infrastructure providers to date and phasing requirements for infrastructure.

6.30. The Site Selection Conclusions Paper [SSP3] documents the Council's overall consideration of such sites. This includes their performance against the site selection criteria, responses provided in the questionnaire, and additional submissions of evidence from the promoter.

6.31. In total, six Significant Sites were originally submitted to the Council for consideration and these were assessed. One site, "Broad location west of A23", was later withdrawn from consideration by the site promoter.

6.32. Paragraphs 3.8 – 3.38 of SSP3 sets out the Council's considerations and conclusions. The Council considered the sites on an individual basis and how they performed in-combination, against the Plan spatial strategy. Sites #18 Crabbet (DPSC2) and #740 Land west of Burgess Hill (DPSC1) were assessed as meeting the third principle of the Plan Strategy. They are adjacent to existing settlements which contain a wide range of services and facilities. In addition, new services and facilities are provided on-site.

6.33. After application of the first three principles of the Plan Strategy, the Council was not able to demonstrate it could meet its housing need or contribute towards unmet needs elsewhere.

- 6.34. Sites #736 Land at Ansty Farm and #799 Land south of Reeds Lane, Sayers Common (DPSC3) had the potential to meet the new fourth principle. SSP3 explains that Land South of Reeds Lane performed better due to transport, infrastructure provision, benefits to existing community and its potential to unlock other smaller sites. It was therefore proposed for allocation.
- 6.35. The fifth site, #1147 Land at Hangman's Acre Farm, Lindfield was not suitable for allocation due to unknown deliverability and availability. Whilst the promoter suggested this site as an alternative during the Regulation 19 consultation, the Council has had no further engagement from the site promoter.
- 6.36. At Sayers Common, the allocation of DPSC3: land to the south of Reeds Lane will improve the sustainability of the existing settlement, with the delivery of on-site infrastructure and improved transport infrastructure. In this context there was an opportunity to allocate four smaller allocations (DPSC4 – DPSC7) at Sayers Common which are unlocked because they will also benefit from the provision of improved services and facilities, as part of a new Sustainable Community. The Plan sets out the vision and objectives for growth at Sayers Common, including collaboration between the site promoters to ensure a cohesive and master-planned development. Further details are set out in response to Matter 5.

Allocation of larger sites

- 6.37. The response to Matter 5 sets out the approach to the size and mix of sites proposed for allocation. As set out in the table above, there is a limited pool of sites of delivering 300 dwellings and above, which in turn has shaped the strategy of the Plan and the palette of allocations to deliver that strategy. The benefits of larger sites are that they are more likely to deliver tangible infrastructure benefits.