



Strategic Housing Land Availability Assessment

Updated Methodology

February 2015



1.0 Introduction

- 1.1 The Mid Sussex Strategic Housing Land Availability Assessment (hereafter referred to as the Assessment) is a comprehensive study of the availability, suitability and likely viability of land to meet the identified need for housing. The Council is required to produce an Assessment by national planning policy set out in the National Planning Policy Framework (NPPF). The Assessment will form part of the evidence base and background information to inform the preparation of the Mid Sussex Local Development Framework.
- 1.2 The methodology is an update to the one prepared in 2008. It should be noted that overall the methodology for undertaking the land availability assessment has remained broadly similar. The methodology has been updated to include references to the current national guidance and reflects the changes to the planning system that have been brought in by the Government in recent years.
- 1.3 The requirement to undertake the Assessment is a requirement of the National Planning Policy Framework, paragraph 159 states that local planning authorities should:

“prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”
- 1.4 Further guidance on how to undertake an Assessment is set out in the Planning Practice Guidance. The Practice Guidance states that

“Plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so”

The methodology set out in this document details how the Council will be undertaking its Assessment. It has been developed against the standard methodology set out in the Practice Guidance.
- 1.5 The Assessment is a background paper only and it is not a statement of Council policy and does not allocate land. Once completed, it will form a key part of the evidence base for the Council's development plan documents and will be used to help inform judgements on the future development and the allocation of land for housing. The Assessment will consider as many options as possible on previously developed (brownfield) land and greenfield land for accommodating residential development. It does not allocate land, pre-empt or prejudice any decision the Council may make in the future on any particular site and does not alter any existing policies or land use designations as set out in the future. Judgements concerning whether sites should be allocated in future Development Plan Documents will be made through the statutory plan process, which will further test the suitability of any sites identified in the Assessment which may be proposed for housing development including Strategic Environmental Assessment and Sustainable Appraisal.
- 1.6 The Assessment will exclude the area of Mid Sussex District that is within the South Downs National Park (The parishes of Fulking, Albourne, Poynings, Pyecombe and parts of Hurstpierpoint and Sayers Common and Hassocks Parishes are within the National Park). The National Park Authority is the planning authority for that part of the District and is preparing its own Development Plan for National Park. The National Park Authority will be publishing a Strategic Housing Land Availability Assessment that covers the National Park. A list of the settlements assessed is set out in Appendix A.

Background

- 1.7 Mid Sussex is located within the County of West Sussex. It lies on the eastern edge of the County and shares boundaries with the Lewes and Wealden Districts in East Sussex to the east, Tandridge District in Surrey to the north, the city of Brighton and Hove to the south, Horsham District to the west and Crawley Borough to the north-west. Mid Sussex covers an area of some 33,400 hectares (approximately 128 square miles) and includes the three main towns of East Grinstead, Burgess Hill and Haywards Heath, set within a predominantly rural area with scattered villages and hamlets. Built up area boundaries have been defined around the towns and villages to establish a clear distinction between the built up areas and the countryside to ensure that this distinctive character of the District is maintained.
- 1.8 The Assessment is one of several background documents and technical reports that inform the Mid Sussex Development Framework. Further information on these background documents can be viewed on the Council website at <http://www.midsussex.gov.uk/ldf> and by following the relevant link.

2.0 Parameters of the Assessment

- 2.1 The Assessment will be a background paper only and it is not a statement of Council policy and does not allocate land. Once completed, it will form a key part of the evidence base for the Council's Development Framework and will be used to help inform judgements on future development and the allocation of land for housing.
- 2.2 The Assessment will consider as many options as possible for accommodating residential development. The findings of the Assessment do not pre-empt or prejudice any decision the Council may make in the future on any particular site and does not alter any existing policies or land use designations as set out in the Local Plan. Judgements concerning whether sites should be allocated in the future will be made through the statutory plan processes which will further test the suitability of any sites identified in the Assessment which may be proposed for housing development including Strategic Environmental Assessment and Sustainable Appraisal.

Purpose and aims of the Assessment

- 2.3 The purpose of the Assessment is to:
- Identify sites and broad locations with potential for housing;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward.

The Assessment aims to identify as many sites with housing potential as possible in and around as many settlements as possible so that plan makers have a palette of sites to choose from for allocation in development plan documents to meet its objectively assessed housing needs.

The Assessment is an important evidence source to inform plan making as it identifies:

- the recent pattern of housing development;
- the choices that are available to best meet the need and demand for more housing;
- what action is required to overcome constraints that impact on the suitability, availability and achievability of sites.

Time parameters of study

- 2.4 The Assessment will cover the period up to 2031 to accord with the plan period for the District Plan.

3.0 The Methodology

- 3.1 Government Guidance states that land availability assessments should be prepared across housing market areas¹. To ensure a consistent and joined-up approach to undertaking the Assessment, an officer-working group has been established with Horsham District and Crawley Borough Council. Together with Mid Sussex, both of these local authorities are within the Crawley – Horsham Housing Market Area. By working closely with these two authorities and following the 'standard methodology' as suggested in the Government Guidance, this will best allow the aggregation of the Assessment to the 'housing market area' level at a later date if required. Assessments have been undertaken by the three authorities within the Housing Market Area at a District level, as neighbouring local authorities have different priorities and are at different stages in the preparation of their Development Framework. However, information contained within the individual Assessments will be collated to inform work undertaken at the Housing Market Area level.

Northern West Sussex Housing Market Partnership

- 3.2 The Housing Market Partnership (HMP) for Northern West Sussex includes Mid Sussex District, Horsham District and Crawley Borough Council along with housing providers across the local area. The HMP has had the opportunity to actively participate in the Strategic Housing Land Availability Assessment (SHLAA) process through a series of joint meetings with housing providers in 2009/2010.
- 3.3 The HMP process has provided an opportunity to debate the suitability, availability and achievability of a selection of sample sites, which were considered representative of different site categories. The HMP raised issues and provided advice about potential development at the sample sites. Whilst some of the points discussed related to site specific issues, the broader principles were consistently applied to all relevant sites within each category. These principles were applied in the absence of site-specific evidence and are only one of many considerations during site assessments.
- 3.4 The HMP was given a further opportunity to review a selection of sites to confirm that the principles were being applied appropriately and make any further comments/suggestions. The HMP agreed that the use of sample sites, followed by a larger review sample, was acceptable in terms of their degree of involvement, given the resource constraints associated with reviewing all SHLAA sites across the Housing Market Partnership area. Appendix B sets out further details on the participants of the HMP and the outcomes.

Who will be involved?

- 3.5 The Planning Practice Guidance states that a variety of organisations should be involved in plan preparation, including the evidence base in relation to land availability. Key stakeholders including adjacent authorities, town and parish councils, landowners and developers will have opportunity to be involved in the assessment. The Council will work with key stakeholders throughout the assessment process to ensure that the Assessment is undertaken in a robust and joined up manner.
- 3.6 The Council will also consult with external stakeholders throughout the assessment process to gain their input into the criteria as set out in the Assessment Template (see Appendix C). This will help to highlight issues such as environmental considerations and infrastructure availability and capacity.

¹ National Planning Practice Guidance (2014)

- 3.7 It is not proposed to reconvene the HMP for this review. However, a workshop session has been held to enable developers and agents to feed into the process of preparing the SHLAA. In particular their views will be sought on the methodology, typologies of sites, as well as discussion about the consistency of the Assessment. The terms of reference for this workshop session are set out in Appendix D. The agreed minutes of the workshop are set out in Appendix E.
- 3.7 Planning Officers from the Planning Policy team of Mid Sussex District Council will lead and undertake the majority of work for the Assessment. The Policy team benefits from having a high degree of local knowledge including natural and historic conservation issues and in-house expertise with GIS electronic mapping.
- 3.8 Officers from the Policy Division will work closely with interdepartmental colleagues at all stages of the Assessment including members of the Housing and Development Management Departments, the Trees and Landscape Officer, the Property Team and the Urban Designer.
- 3.9 Consultants (Land Use Consultants) were appointed to provide more detailed landscape information on a selection for sites. The findings of this work will be published as a separate report. Further information is provided in Paragraph 3.16 of this methodology.

Planning Practice Guidance

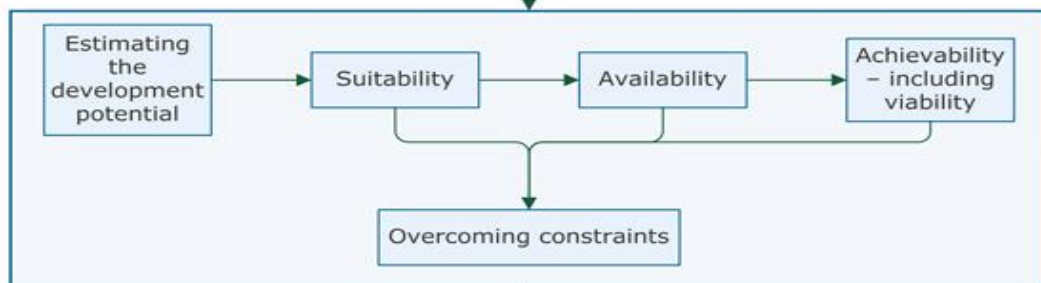
- 3.9 The Planning Practice Guidance sets out five main stages for the undertaking of an Assessment. The Methodology sets out in turn, how each of these stages is to be undertaken as part of the Assessment process. The stages of the Assessment are set out in Figure 1.

Figure 1 – Assessment of Land Availability process and outputs

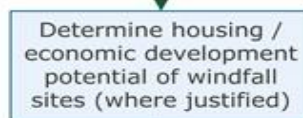
Stage 1- Site / broad location identification



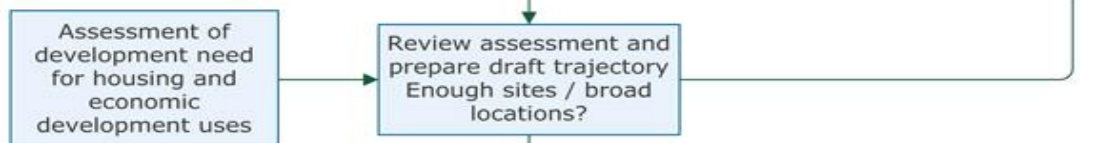
Stage 2 - Site / broad location assessment



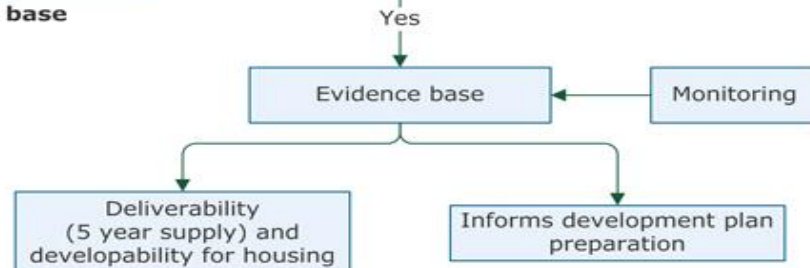
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Source: National Planning Policy Guidance (March 2014)

Stage 1 – Site/ broad location identification, assessment area and site size

Determine the assessment area and site size

- 3.10 The assessment will identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land. The assessment will provide information to enable identification of sites and locations suitable for allocation through a development plan document.
- 3.11 The assessment will assess a range of different site sizes from small scale developments, to extensions to towns and villages and new settlements. Sites that can deliver 6 or more dwellings will be considered. It is acknowledged that the Planning Practice Guidance sets out that the threshold for assessment should be sites that could accommodate 5 units or more, however previously the assessment has included sites of 6 or more and this will continue. There reasons for this are that the number of additional sites that would come forward would be limited and not make a significant impact on the total 'palette' of sites; the monitoring systems for housing completions and supply at the County level are at a threshold of 6 and therefore reducing threshold would cause monitoring difficulties in the future; suitable small sites can still come forward for development as windfalls without being allocated in the development plan; this approach is consistent with that taken by neighbouring authorities.

Identifying sites and broad locations

- 3.12 The Assessment will seek to maximise sources of housing potential and a thorough site search and desktop review will be undertaken. It will be necessary to consider sites presently in the planning process as well as new opportunities, including sites that have not been put forward to the council. Government Guidance² identifies a number of sites within and outside of the planning process and this has been used as the basis for sites that should be included in the Assessment as set out in Table 1.

Table 1 – Sources of sites with potential for housing

Sites in the planning process
<ul style="list-style-type: none"> land allocated (or with permission) for employment or other land uses which are no longer required for those uses existing housing allocations and site development briefs unimplemented / outstanding planning permissions for housing planning permissions for housing that are under construction
Sites not currently in the planning process
<ul style="list-style-type: none"> planning applications that have been refused or withdrawn vacant and derelict land and buildings surplus and likely to become surplus public sector land land in the local authority's ownership land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use

²National Planning Practice Guidance (March 2014)

- | |
|--|
| <p>development</p> <ul style="list-style-type: none"> • additional housing opportunities in established residential areas, such as under-used garage blocks • large scale redevelopment and re-design of existing residential areas • sites in rural settlements and rural exception sites • sites in rural locations • urban extensions • new free standing settlements |
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3.13 Planning Practice Guidance states that sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness but these constraints must be clearly set out, including where they severely restrict development. Planning Practice Guidance goes on to state that the comprehensive list of sites and broad locations derived from data sources and the call for sites should be assessed against national policies and designations to establish which has reasonable potential for development and should be included in the site survey.

Figure 2 sets out the sites/areas that are to be excluded from the detailed assessment, along with the justification for the exclusion. However, as part of the review of the Assessment all sites currently in the existing Assessment but excluded, will be tested again to review the appropriateness of previously defined constraints.

Figure 2 – Sites/areas to be excluded from detailed Assessment

Sites/ areas to be excluded from detailed Assessment	Justification
<p>Ancient Woodland – sites that are wholly designated as Ancient Woodland.</p> <p>(There is 5,282 ha of ancient woodlands, that cover 15.8% of the District).</p>	<p>NPPF 118 states that planning permission should be refused for development in the loss or deterioration of irreplaceable habitats including ancient woodland, unless benefits clearly outweigh the loss.</p>
<p>Sites of Special Scientific Interest (SSSI)</p> <p>There are 13 SSSI's, covering 639.7ha, which makes up 1.9% of the District).</p>	<p>NPPF – Para 118 states that proposed development on land within or outside a SSSI should not normally be permitted.</p>
<p>Sites of Nature Conservation Interest (SNCI) - – sites that are wholly designated as Local Nature Reserves</p> <p>(There are 50 SNCI's, covering 1,094ha, which makes up 3.3% of the District</p>	<p>NPPF para 109 states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity. SNCI's make an important contribution to biodiversity.</p>

Scheduled Ancient Monuments	NPPF – Para 132 states that substantial harm to or loss of designated heritage assets, including scheduled monuments should be wholly exceptional.
<p>Sites wholly outside and unrelated to existing settlement built up area boundaries.</p> <p>An exception can be made for sites delivering 100% affordable housing to meet local need or where there are special circumstances that would justify the Assessment of a site in accordance with paragraph 55 of the NPPF.</p> <p>An exception to this approach is where the scale of development proposed would result in a self-sufficient community, in the form of a new settlement as set out in table 1.</p>	<p>NPPF para 17 states that planning should take account of the different roles and character of different areas, promoting the vitality of main urban areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. Built up area boundaries have been defined around built up areas to maintain the distinct character of Mid Sussex (as set out in paragraph 1.6 of this methodology).</p> <p>NPPF – Para 55 states that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities....Local Planning authorities should avoid isolated homes in the countryside unless there are special circumstances”.</p> <p>NPPF – Para 54 makes provision for planning authorities to provide affordable housing through rural exception sites. Therefore sites proposing the provision of 100% affordable housing will be included within the Assessment.</p>

3.14 The assessment will include looking at potential development sites within an Area of Outstanding Natural Beauty (AONB) and will need to take account of national and local policies for its protection. Development will not be ruled out but will need to be in accordance with local needs and in conformity with the primary objective of AONB policy, namely the enhancement and conservation of natural beauty. This will be reflected in the assessment of sites and in drawing up conclusions.

3.15 As part of the evidence base to inform the Development Framework, a Landscape Capacity Assessment was undertaken in July 2007 to assess the physical and environmental constraints on development in the District with a view to identifying the capacity of the District landscape to accommodate future development. The study has been carried out to inform the Development Framework by identifying where *strategic* level development might be accommodated within the District without an unacceptable impact on landscape character in general and on the setting of outstanding assets within Mid Sussex. The findings of this Assessment will be reflected in the assessment of sites of strategic level sites (for the purposes of the study defined as sites with a capacity of or above 250 dwellings).

3.16 In order to supplement the Landscape Capacity Assessment and to get a better understanding of landscape capacity at a smaller site level, a further study has been undertaken by consultants. The study provides a more detailed landscape assessment of some of the sites. Sites that have been assessed as suitable, available and achievable, as well as sites that are available and achievable have been analysed in greater detail. The object of this is to ensure the results of the higher level Landscape Capacity Study

reflect the situation at a more local level. This study also identifies where parts of sites have capacity for developed in landscape terms and suggest where mitigation may be appropriate. This study is published as a separate report.

- 3.17 In 2014 a Mid Sussex District Capacity study was undertaken. The objective of this study was to identify the capacity of the District to accommodate further growth when taking into account environmental constraints, infrastructure capacity and social infrastructure. The study draws conclusions about the areas of district with the greatest capacity for growth, taking into account the factors above. The findings of this study will be taken into account during the assessment of sites. This will ensure that the sites have been assessed in a consistent manner, when considering the environmental, infrastructure and social infrastructure.

Types of site and sources of data

- 3.18 A systematic desktop search to identify potential housing sites and to review progress on known sites will be undertaken (as set out in Table 3).

Table 3 – Sources of information

Housing Source	Information Source
Site allocations and development briefs not yet the subject of planning permission	Local and Neighbourhood Plan housing sites Small Scale Housing Allocation DPD sites Planning application records Development briefs
Planning permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records
Planning application refused or withdrawn	Planning application records
Dwelling starts and completion records	MSDC commencement and completions database. WSCC Housing Land Supply information
Sites considered for housing allocation for the Local Plan and Small Scale Housing Allocation DPD	Review all sites considered during the site selection process
Sites submitted following invitation during Assessment process (see Paragraph 3.19)	Review all sites submitted following invitation to submit sites as part of Assessment process
Sites subject to pre-application advice	Review records of development control pre-application meetings
Additional opportunities in established uses (e.g. making productive use of underutilised facilities)	Ordnance survey maps Aerial photography Planning applications Site surveys
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	Review all sites for Mid Sussex included in the National Register of public sector land Engagement with strategic plans of other public sector bodies

Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Vacant and derelict land and buildings (including redundant permitted buildings)	Local Authority Empty Property Register English House Condition Survey National land use database commercial property databases (e.g. estate agents and property agents Valuation officer database, active engagement with sector
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications
Sites in and adjoining villages or rural settlements and rural exception sites	Ordnance Survey maps Aerial photography
Potential urban extension and new free standing settlements	Site surveys

Call for potential sites and broad locations

- 3.19 A call for potential sites and broad locations for development will be issued. This will target a wide an audience as possible. This will include emails/ letters and e-mail alert. In addition information placed on the Council's website to inform parties not currently known to the Council. Respondents will be asked to complete a pro-forma to ensure an initial assessment of the site/broad location can be made. A copy of the pro-forma is available on the Council website at www.midsussex.gov.uk/shlaa.

The promoters of sites already in the Assessment will be contacted, where possible, to confirm that the information that the council holds is up to date.

Site and broad location surveys

- 3.20 Any new sites and broad locations that emerge from data sources and call for sites will be assessed against national policies and designations to establish which have a reasonable potential for development and should be included in the site survey.
- 3.21 Practice Guidance states that all sites identified by the desktop review should be visited to aid the robustness of the Assessment, but that site surveys should be proportionate to the detail required for a robust appraisal. The object of site surveys is to:
- Ratify inconsistent information gathered through the call for sites and desk assessment
 - get an up to date view on development progress
 - gain a better understanding of what type and scale of development may be appropriate,
 - gain a more detailed understanding of deliverability; and how any barriers and how they could be overcome,
 - identify further sites with potential for development that were not identified through data sources or the call for sites.
- 3.22 It may not be necessary to visit each site identified by the desktop review, particularly those that have commenced development or are subject to extant planning permission, as the Planning Policy team currently monitors completions and can consult with colleagues from the Development Management and Building Control Departments. In addition, the Planning Services Team at West Sussex County Council, in conjunction with Mid Sussex

District Council, also monitor the progress of housing sites as part of the West Sussex Housing Land Study. It is therefore proposed, that a site visit will not be necessary where comprehensive information on a site is known through these sources. All other remaining sites (that meet the criteria as outlined below) will be surveyed as part of the Assessment and this will aid in providing evidence if there is a reasonable chance of a site being developed for housing.

Information to be collected during survey

3.23 The following characteristics will be recorded as part of the site survey

- site size, boundaries and location
- current land use and character
- Land uses and character of surrounding area
- Physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities)
- Potential environmental constraints
- Where relevant, development progress
- Initial assessment of whether the site is suitable for a particular type of use/ mixed use development

Stage 2: Site/broad location assessment. Identifying the development potential of each site/broad location

Calculating the development potential

3.24 Practice Guidance states that the development potential of each identified site should be guided by existing and emerging policy, including locally determined policies on density. Relevant existing schemes can be used as the basis for assessment, adjusted for any individual site characteristics for a particular use. The housing densities provided by the Assessment are indicative to the theoretical potential for future development. It should be noted that, as stated in Paragraph 1.5, the Assessment does not pre-empt or prejudice any decision the Council may make in the future on any particular site and the assumptions made on densities should not be taken out of this context.

Character assessment

3.25 An assessment of the pre-dominant character of the surrounding area will be made to guide the acceptable level of density that could theoretically be achieved. These will be classified into four broad bandings – areas of lower, medium or higher density and areas of flatted or suitable for flatted development.

Calculating potential site yield

3.26 Table 4 sets out the overall broad classifications that will be used to estimate the theoretical density achievable. These classifications will be used to aid clarity to the estimations of site potential and the robustness of the assessment process. It is likely that there will be exceptions where site-specific circumstances or comparable schemes have justified a potential that is significantly higher or lower than would otherwise be expected. The reasons for any exceptions will be set out within individual site assessments.

Table 4 – Theoretical site potential densities

Density range classification	Yield – (dph)	Factors
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Lower density	30	<ul style="list-style-type: none"> • Area of homogenous low density housing (30 dph or below) • Likely to be towards edge of urban areas or within smaller settlements • Poor accessibility / public transport service to essential facilities
Medium density	40	<ul style="list-style-type: none"> • Area of homogenous medium-high density housing (30-50 dph) • Areas of mixed use with good accessibility to most essential facilities • Reasonably well served by public transport service to essential facilities
High Density	50	<ul style="list-style-type: none"> • Area of homogenous high density housing (50 dph) • Likely to be town centre location • Very good accessibility / public transport service to essential facilities
Flatted developments	50 - 100+	<ul style="list-style-type: none"> • Areas of flatted or suitable for flatted development • Excellent accessibility / public transport service to essential facilities including commuter transport links

3.27 The housing potential of a site refers to the net³ number of dwellings that the site can be assumed to accommodate through its development or conversion of existing buildings. It is important that the Assessment process recognises the balance that needs to be struck between making efficient use of land through good design principles without detriment to local infrastructure and harming the amenities of surrounding land uses and the character and historic fabric of the area.

3.28 The use of theoretical site densities should not prejudice or discourage the submission of illustrative schemes by site proponents to demonstrate and justify achievable densities for individual housing sites.

Assessing the suitability of sites and broad locations for development

3.29 Assessing the suitability, availability and achievability of sites, including whether the site is economically viable, will provide the information on which the judgement can be made in the plan making context as to whether a site can be considered developable over the plan period.

3.30 Planning Practice Guidance states that plan makers should assess the suitability of the identified use or mix of uses of a particular site/broad location. The assessment of suitability of sites for development should be guided by the development plan (consideration needs to be given to how up to date the plan policies are), emerging plan policy and national policy; as well as market and industry requirements in that housing market. During the Assessment process consideration needs to be given to the appropriateness of identified constraints on sites and whether such constraints may be overcome.

3.31 In accordance with the guidelines, where broad locations have been identified, these will be included in the Assessment. However, it is important not to prejudice options being considered for growth through the Local Development Framework. Therefore, should it be decided to *identify* broad locations to address any housing requirement shortfall, the

³ Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.

Assessment will only identify feasible locations with housing potential for consideration in the Local Development Framework. It is considered not appropriate for the Assessment to ‘encourage’ a specific broad location, particularly as other competing locations may be available.

- 3.32 The housing potential for broad locations will be assessed using the same approach as for individual sites, albeit at a larger scale, by applying an appropriate density based on an example scheme and applying the calculation to the location.
- 3.33 Allocated sites and sites with planning permission will be reviewed as part of the assessment process, to consider if circumstances have changed which would impact on their suitability. This assessment will be informed by a range of factors including the suitability of the land for different uses and by market signals, which will assist in identifying the most appropriate use.
- 3.34 The assessment of the suitability of sites will also include:
- Physical limitations or problems such as access, infrastructure, ground condition, flood risk hazardous risks, pollution and contamination
 - Potential impact including the effect upon landscape features, nature and heritage conservation
 - Appropriateness and likely market attractiveness for the type of development proposed
 - Environmental / amenity impacts experienced by future occupiers and neighbours
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Accessibility ratings

- 3.35 The potential of each site should take full consideration of its location in terms of distance and accessibility to essential facilities on foot or by public transport. Consideration is given to the ability of the largest strategic sites and broad locations to deliver infrastructure as part of the development to ensure it is well related to facilities required to support development rather than relying on existing provision.

Accessibility on foot

- 3.36 The ‘distance thresholds’ suggested are a broad and flexible guide to the distance which people *in general* will be willing to travel on foot in order to use or visit a facility. Practice Guidance suggests a maximum distance that people will realistically walk from residential areas to shops, schools and workplaces of 1.6km (approximately 1 mile).
- 3.37 Distance measurements need to be as realistic as possible. For this reason, measurements will be taken from the centre of each site following a practical route that walkers will potentially use (a straight-line measurement ‘as the crow flies’ will therefore not be used). For this Assessment, essential facilities are defined as retail centres (town and village centres), local shop/s, train stations, GP doctor, primary and secondary schools. Table 5 sets out the broad classifications that will be used for evaluating accessibility on foot.

Table 5 – Ratings for distance to essential facilities

Excellent	<0.8km (10 minutes’ walk)
Good	0.8km – 1.2 (10 - 15 minute walk)

Fair	1.2km – 1.6km – (15 – 20 minute walk)
Poor	>1.6km (>20 minute walk)

Accessibility by public transport

- 3.38 Each site will be assessed on how well it is served by public transport. The distance of each site from a bus stop is measured, alongside the frequency of service from the nearest stop. Each site is then graded in relation to the frequency of service as demonstrated in Table 6. It should be noted that larger strategic sites have the potential to provide an extension to existing bus services and/ or provide new services and this will need to be taken into consideration during the assessment process.

Table 6 – Accessibility zones classification

Excellent – Zone 1	4 or more buses per hour stopping all day with good commuter services
Good – Zone 2	2 or more buses per hour stopping all day
Fair – Zone 3	Infrequent services of less than 2 buses per hour
Poor – Not classified	Not classified

Considering availability

- 3.39 A site is considered to be available for development, when, on the best information available there is confidence that there are no legal or ownership problems. The existence of a planning permission does not necessarily mean that the site is available. If potential problems are identified an assessment will need to be made as to how and when they can realistically be overcome.

Considering achievability

- 3.40 If there is a reasonable prospect that the particular type of development will be developed on a site at a particular point in time, then a site is considered to be achievable. This is essentially a judgement about the economic viability of a site and the capacity of the developer to sell the development.
- 3.41 The economic viability of a housing site is a significant factor in its potential for development. A site may be severely restricted by physical problems or limitations such as access, infrastructure or contaminated land that can affect the achievable density and the cost of the scheme, both to the detriment of its economic viability.
- 3.42 An evaluation will be made on the availability and estimated costs of required infrastructure to develop a site. For the purpose of the Assessment, the criterion for infrastructure is defined as water, surface and foul water drainage, highways and transport, electricity and gas. The requirement for contributions towards affordable

housing and other necessary infrastructure through Section 106 agreements will also need to be considered in the overall assessment of site viability.

Impact of constraints on suitability, achievability and achievability

- 3.43 Consideration will be given to the actions that would be required for constraints to be overcome. This would include consideration of when and how they could be overcome and the likelihood of sites/broad locations being delivered.
- 3.44 An assessment template has been developed and this is available to view in Appendix C. Although it is difficult to provide any degree of certainty, particularly in the medium to long term, this will offer a clear, equal and structured method of assessment for all the sites to limit the application of subjective and inconsistent assumptions.
- 3.45 It should be noted that the assessment template was designed not simply as a means of determining whether a site is 'in or out' of the assessment, but as a first-stage tool to inform how the site could be developed, what would need to be done to achieve a successful development and when it might come forward and to be used as part of the qualitative consideration of all the available evidence. For instance a site may be acceptable but the market or other site-specific constraints may impede delivery.
- 3.46 The Assessment will also consider what action would need to be taken to overcome constraints made for all sites that are found to be 'not currently developable'. An individual statement on a site-by-site basis will be produced.
- 3.47 Information on the suitability, availability and constraints will be used to assess the timescale within which each site could be developed. The advice of developers and local agents will be used to inform conclusions on delivery timescales.

Stage 3 Determining the housing potential of windfall sites

- 3.48 The National Planning Policy Framework outlines⁴ that an allowance for windfall sites in the five year supply can be made if there is compelling evidence. In these circumstances an allowance may be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends and should not include residential gardens. The Windfall Study is set as a separate report to the Strategic Housing Land Available Assessment.
- 3.49 The decision on whether to include a windfall allowance will need to be justified later in the Plan making process and this decision will need to reflect how comprehensive and intensive the Assessment has been in identifying sites and broad locations for future growth as a whole, and the extent to which the assessment has been informed by the industry and market intelligence.

Stage 4 Assessment review

- 3.50 Once the initial survey of sites and the assessment of their deliverability/developability have been made, the housing potential of all sites will be collated to produce an indicative housing trajectory that sets out how much housing can be provided and at what point in the future. A Housing Trajectory will be included within the District Plan and will be updated annually through the Monitoring Report.

⁴ Paragraph 48, NPPF

- 3.51 Practice Guidance recommends that an overall risk assessment should be made as to whether sites will come forward as anticipated as the Assessment may conclude that insufficient sites have been identified to meet strategic housing requirements and that further sites need to be sought. If this is the case, it will be necessary to investigate how this shortfall should best be planned. This will include revisiting the Assessment e.g. changing assumptions of potential particular sites or reviewing constraints. If there is still a shortfall in sites, consideration needs to be given to how needs might be met in adjoining areas.

Stage 5 Final evidence base

- 3.52 The Planning Practice Guidance states that the Assessment should provide a set of standard outputs to ensure consistency, accessibility and transparency. The Assessment will therefore provide:

- a list of sites and broad locations, cross-referenced to maps showing locations and boundaries of specific sites;
- an assessment of the deliverability/ developability of each identified site/ broad location (i.e. in terms of its suitability, availability and achievability to determine whether a site is realistically expected to be developed and when; (more detail will be provided for those sites which are considered to be realistic candidates for development).
- Evidenced and justified reasons will be given for sites that have been discounted;
- the potential type and quantity of housing that could be delivered on each identified site broad location;
- where constraints have been identified, an assessment of how barriers to delivery could be overcome.
- An indicative trajectory of anticipated development and consideration of associated risks (The trajectory will be published in the District Plan and updated by monitoring reports).

- 3.53 The final document will be available to view on the Council web site in an accessible form.

Deliverability and developability determined in relation to housing supply

- 3.54 The National Planning Policy Framework requires all Local Planning Authorities to identify and update annually a supply of 'deliverable' sites sufficient to provide five years' worth of housing against their housing requirements. In addition, it also requires the identification of a supply of specific, developable sites or broad locations for growth, for 6-10 years and where possible for years 11 -15.

- 3.55 To be considered **deliverable**, a site should be *available* now, offer a *suitable* location for housing development now and be *achievable*, offering a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable⁵. Deliverable sites include sites that are allocated for housing in a development plan document or a Neighbourhood Plan. All allocated sites will be reviewed to confirm that there is evidence that the site will be developed within 5 years. Planning permissions will also be reviewed to confirm that the planning permission will be implemented before the permission expires.

⁵ See footnote 11, NPPF

- 3.56 There may be sites that are considered to be deliverable within the first five years that have not got planning permission or an allocation in a development plan. In such cases clear up to date evidence to support the deliverability of site will be included within the Assessment. In the majority of cases if there are no significant constraints to overcome site can be considered capable of being delivered within a five year timeframe.
- 3.57 On larger sites the phasing of build out rates will be taken into account to ensure an accurate figure is included in the five year supply.
- 3.58 To be considered **developable**, a site should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available and could be viably developed at a specific point in time⁶. The Assessment will consider when such sites are likely to come forward so that they can be included in the housing trajectory.
- 3.59 Guidance states that an assessment of the **suitability, availability and achievability** (including the economic viability) of a site will provide the information on which the judgements can be made in the plan making context as to whether a site can be considered deliverable, developable or not currently developable for housing development.

Monitoring

- 3.60 The Assessment of sites will be kept up to date as part of the authorities monitoring report on an annual basis. A full re-survey of sites and broad locations will be undertaken when the District Plan is being prepared or reviewed or if other significant change make this necessary (for example, if the Council can no longer demonstrate a five year supply of sites for housing).
- 3.61 As part of the housing supply monitoring process the Planning Policy team currently monitors completions and planning permissions in consultation with colleagues from the Development Management and Building Control Departments. In addition, the Planning Services Team at West Sussex County Council, in conjunction with Mid Sussex District Council, also monitor the progress of housing sites as part of the West Sussex Housing Land Study. This ensures that on an annual basis progress on the delivery of development on allocated and sites with planning permissions is recorded along with new planning permissions granted. The supply of sites through windfalls (where justified) will be monitored to assess whether or not that source of supply is coming forward as anticipated, making adjustment to this if necessary.
- 3.62 Through the authority's monitoring report, updates will also be provided where:
- Progress has been made in removing constraints on development and whether a site is now considered to be deliverable or developable.
 - Unforeseen constraints that have emerged that make a site no longer deliverable or developable and how these could be addressed

⁶ See footnote 12, NPPF

Appendix A – List of settlements to be assessed

Towns

Burgess Hill
East Grinstead
Haywards Heath

Settlements within the rural area

Albourne
Ansty
Ardingly
Ashurst Wood
Balcombe
Bolney
Copthorne
Crawley Down
Cuckfield
Handcross
Hassocks and Keymer
Horsted Keynes
Hurstpierpoint
Lindfield
Pease Pottage
Sayers Common
Scaynes Hill
Sharpthorne
Turners Hill
Warninglid
West Hoathly

Appendix B – Housing Market Partnership

Invitation List

Action in Rural Sussex	Henry Adams
Adams Integra	Hillreed
Affinity Sutton	Home Builders Federation
Barton Willmore	Homes and Communities Agency
Bellway Homes Ltd	Horsham Chamber of Commerce
Berkeley Strategic	Housing Corporation
Bloomfields Chartered Town Planners	Hyde Housing Association
Brett Incorporated Ltd	Independent Town Planning Services
CADIA	Judith Ashton Associates (Southern HBF)
CB Richard Ellis Ltd (for English Partnership) Kier	
Clifford Dann	Leaders
Clive Voller Associates	Miller Strategic Land
Connells Land and Planning	Moat Housing Association
Countryside Properties (Southern Ltd)	Montagu Evans
Crest Nicholson Ltd	Network Rail
Croudace Strategic Ltd	Persimmon Homes (South East) Ltd
Cubitt and West	Peter Taylor Associates
David Wilson Homes	Raglan Housing Association
Devine Homes Plc	RPS Planning and Development Ltd
DMH Stallard	Rydon Homes Ltd
Drivers Jonas	Savills
English Partnerships	Saxon Weald Housing Association
English Rural Housing Association	Southern Housing Group
Fairview New Homes Ltd	Taylor Wimpey Strategic Land
GL Hearn	Thornfield Properties
Gleeson Homes	Welbeck Land Ltd
Greenoak Housing Association	West Sussex County Council - Local Development
GVA Grimley	West Sussex Social and Caring Services
Crawley Borough Council – six officers from Housing, Planning & Regeneration	
Horsham District Council – two officers from Housing, Planning Development and Environment	
Mid Sussex District Council – five officers from Housing & Planning	
West Sussex Strategic Housing Market Assessment (SHMA) Project Manager	

Work Programme

2nd Oct 2009 – Inception Meeting (Horsham)

The Housing Market Partnership (HMP) was convened and the Methodology was discussed and amended. Terms of Reference was agreed and the process for engaging the HMP in the three respective SHLAAs was outlined.

5th Nov 2009 – Round-table workshop (Mid Sussex)

A series of *Categories* for each Local Authority was produced, broadly covering all sites in each SHLAA. *Sample sites* for each *Category* were presented and discussed. A set of *Category Principles* were drawn from the discussions at this workshop and applied to all similar sites in each SHLAA.

19th May 2010 – Agreement & ‘sign-off’ (Mid Sussex)

Final meeting of the HMP to review a further set of Samples to demonstrate the Principles had been applied correctly. The Statement of Agreement was ‘signed-off’ by general consensus.

Active Members

Action in Rural Sussex	GVA Grimley
Adams Integra	Hillreed
Affinity Sutton	Miller Strategic Land
Barton Willmore	Persimmon Homes (South East) Ltd
Berkeley Strategic	RPS Planning and Development Ltd
Crest Nicholson Ltd	Rydon Homes Ltd
Croudace	Saxon Weald Housing Association
Croudace Strategic Ltd	SHMA Project Manager
Cubitt and West	Southern Housing Group
Devine Homes Plc	Thornfield Properties
DMH Stallard	West Sussex County Council
Gleeson Homes	Officers of CBC, HDC & MSDC

Terms of Reference (for HMP Members)

The following Terms of Reference was circulated and agreed by all Members of the HMP prior to involvement. Participation as a Member of the HMP is agreed on the understanding that no commercial or other advantage will be sought and that the primary role of each Member is to represent their sector as a whole and not the interests of their particular organisation. HMP members take part on an entirely voluntary basis and are required to declare any interest they may have on a site during discussions.

Crawley Borough Council, Horsham District Council and Mid Sussex District Councils' Strategic Housing Land Availability Assessment (SHLAA) Housing Market Partnership (HMP)

Terms of Reference

1. To contribute to the completion of a robust and credible Strategic Housing Land Availability Assessment (hereafter referred to as the Assessment).
2. To share and pool information and intelligence.
3. To contribute to identifying what, if any, issues that may be of particular relevance to the Assessment and should be investigated, in addition to the requirements set out in Practice Guidance.
4. To consider the implications of the Assessment, including signing off the Assessment report, the core outputs and agreeing follow-up actions.
5. Should members of the Panel be unable to agree on particular issues (i.e. methodologies and data sources used, the interpretation of findings and the sign-off of the Assessment) such differences or outstanding issues will be raised in the findings.
6. Should a meeting prove necessary and an individual member not be able to attend a meeting, they may seek to identify a substitute from their organisation to take part.
7. Invitations to join the Partnership are made on the understanding that no commercial or other advantage will be sought and that their primary role is to represent their sector as a whole and not just the interests of their particular organisation. Partnership members are required to declare any interest they may have on a site when contributing towards its assessment.

8. Membership of the Partnership will be undertaken on a voluntary basis. The Councils' will not be liable for any expenses incurred during the Assessment process.

Statement of Agreement

Following the final meeting of 19th May 2010, general consensus* was reached to 'sign-off' the following Statement of Agreement by the HMP. Those Members not present were also notified in advance and after the meeting and given the opportunity to comment.

May 2010

Housing Market Partnership Statement

Strategic Housing Land Availability Assessment Northern West Sussex Housing Market Area

The Housing Market Partnership (HMP) for Northern West Sussex (Horsham District, Mid-Sussex District and Crawley Borough), has had the opportunity to actively participate in the Strategic Housing Land Availability Assessment (SHLAA) process covering the above Local Authority areas, through a series of joint meetings with the Local Authorities.

The HMP process included the opportunity to debate the suitability, availability and achievability of a selection of Sample sites, which were representative of different Categories, with other Members of the HMP and the Local Authority officers. The HMP raised issues and provided advice about potential development at the sample sites for each Category. Whilst some of the points discussed related to site specific issues, the broader Principles were then consistently applied to all relevant sites within each Category through a Review of each Authority's SHLAA. The Principles were applied in the absence of more site-specific evidence and are only one of many considerations during site assessments.

Following the implementation of these Principles, the HMP had the opportunity to review a further selection of sites to confirm that the principles were applied appropriately and make any further comments or suggestions. The HMP agreed the use of sample sites, followed by a larger review sample, would provide the optimum solution to being involved in the SHLAA process; especially given the resource constraints over the large geographical area and total number of sites.

Whilst the HMP has had the opportunity to comment on and steer the method of assessing sites and key issues, the use of samples has been on a high level principle approach and not on a site by site basis. Therefore the HMP, whilst agreeing with the broad approach taken to site assessments, retains the capacity to question individual site specific issues and findings.

However, overall the HMP agrees they have been actively engaged in the SHLAA process and consulted on the findings for all three Local Authorities comprising the Northern West Sussex housing market area. The Housing Market Partnership's valuable contribution to the process has been appreciated by the Local Authorities and their unique and valuable advice has been incorporated into the approach taken with each SHLAA.

*General Consensus to 'sign-off' the Statement of Agreement was reached with the following exceptions:
-One abstention; and

-The representative from Miller Strategic Land wished to add the following addendum to his Statement of Agreement:

“In addition to the reservation of right to comment on individual sites, Miller note that while it has had opportunity to comment on assessment of suitability, the assessment is essentially that of the Local Authority. However, the participating companies do not necessarily endorse the general approach to suitability in terms of the sustainability of development at some of the settlements or the existence of policy constraint without commitment to review that policy and reserve the right to comment on the generality of the approach.

Miller also note that its advice concerning the present underlying weakness of the housing market, and particularly that for flats, has resulted in a revised delivery forecast to many sites from years 1-5 to years 6-10. Rates and extent of recovery in the market are unknown and the above assessment may prove correct or unduly optimistic. Miller note that this inherent uncertainty needs to be accommodated by contingency arrangements in any future delivery strategy.”

This caveat relates to the assessment of *suitability* and future market conditions and is accepted in this case, although these aspects are covered by the main Report.

Appendix C - Assessment template

Suitability				
Criteria		Source		
		Desktop	Survey	Stakeholders
Exclude from Assessment	Areas located within any one of the following designations: Ancient Woodland; Local Nature Reserves; Sites of Special Scientific Interest (SSSI); Sites of Nature Conservation Interest (SNCI); Scheduled Ancient Monuments;	✓		
	Sites wholly outside and unrelated to existing settlements within Mid Sussex (see Appendix A) except for sites delivering 100% affordable housing to meet local need (rural exception sites)	✓		
Sustainable location of site				
Category of settlement	Category 1 - Preferred location for major housing development	✓		
	Category 2 - Location for housing development to meet the needs of the larger individual villages and surrounding communities	✓		
	Category 3 - Location for housing development to meet the needs of the individual villages and surrounding communities	✓		
	Category 4 - <u>Location for housing development to meet the needs of the individual villages and rural hinterland</u>	✓		
	Category 5 - Housing development only permitted in exceptional circumstances	✓		
	Category 6 – New settlement	✓		
Re-use of land	Site is previously developed land	✓	✓	
	Site is mixed greenfield / previously developed land	✓	✓	
	Site is greenfield	✓	✓	
Location of site	Within defined built up area (infill development)	✓		
	Within built up area of settlement	✓		
	Edge of settlement boundary	✓		
Agricultural land	Site is classified as being Grade 1 quality agricultural land	✓		✓
	Site is classified as being Grade 2 quality agricultural land	✓		✓

Criteria		Source		
		Desktop	Survey	Stakeholders
Accessibility on foot to essential local services	Site is within 800 metres walking distance of all of the following: convenience store, GP surgery, primary school	✓		
	Site is within 800 metres walking distance of two of the following: convenience store, GP surgery, primary school	✓		
	Site is within 800 metres walking distance of one of the following: convenience store, GP surgery, primary school	✓		
	Site is within 1.2km walking distance of all of the following: convenience store, GP surgery, primary school	✓		
	Site is within 1.2km walking distance of two of the following: convenience store, GP surgery, primary school	✓		
	Site is within 1.2km walking distance of one of the following: convenience store, GP surgery, primary school	✓		
	Site is more than 1.2km walking distance from all of the following: convenience store, GP surgery, primary school	✓		
	Consideration of largest strategic sites and broad locations to provide infrastructure to ensure new development is accessible to local services	✓		
Accessibility by public transport	Site rated as having excellent accessibility within 400 metres of a bus stop	✓		
	Sites rated as having good accessibility within 800 metres of a bus stop	✓		
	Bus service is rated as excellent (4 or more buses per hour stopping all day with good commuter services)	✓		
	Bus service is rated as good (2 or more buses per hour stopping all day)	✓		
	Bus service is rated as fair (Infrequent service of less than 2 buses per hour)	✓		
	Site rated as having excellent accessibility within 800 metres of a railway station	✓		
	Sites rated as having good accessibility within 1.2km of a railway station	✓		
	Site rated as having fair accessibility within 1.6km of a railway station	✓		
	Sites rated as having poor accessibility beyond 1.6km of a railway station	✓		

Policy restrictions				
Designations	Site is unaffected by designations	✓		
	Site located within or largely affected by trees or woodland subject to preservation order	✓		
	Site located within AONB / proposed South Downs National Park	✓		
Criteria		Source		
		Desktop	Survey	Stakeholders
Physical problems or limitations				
Infrastructure				
Access	Safe access to site already exists	✓	✓	✓
	Safe access is not available but potential exists to easily gain access	✓	✓	✓
	Safe access is unavailable or affected by severe limitations/ restrictions	✓	✓	✓
Highways issues	Site is unaffected by highways issues	✓	✓	✓
	Site is affected by highways issues but not to a significant extent	✓	✓	✓
	Site is affected by severe highways issues	✓	✓	✓
Utilities availability and capacity	Site is unaffected by deficiencies in availability and capacity of utilities infrastructure (water, surface and foul water drainage and energy supplies)	✓	✓	✓
	Site is affected by deficiencies in availability and capacity of utilities infrastructure but not to a significant extent	✓	✓	✓
	Site is severely affected by deficiencies in utilities infrastructure	✓	✓	✓
Strategic Road Network (SRN)	Site would have a negligible impact on the SRN			✓
	Site would have a manageable impact upon the SRN			✓
	Site would have a severe impact upon the SRN			✓

Ground conditions	Site is unaffected by ground condition limitations (i.e. unstable ground/ steep slopes)	✓	✓	
	Site is affected by ground conditions but not to a significant effect	✓	✓	
	Site is severely affected by ground conditions	✓	✓	
Contaminated land/ hazardous risk	Site is unaffected by land contamination issues/ hazardous risk	✓		✓
	Site has potential land contamination issues / hazardous risk that may require mediation	✓		✓
	Site has land contamination issues / hazardous risk that may severely affect deliverability of site	✓		✓
	Site is within 250m of historic landfill site	✓		✓
Groundwater source protection	Site is unaffected by groundwater source protection issues	✓		✓
	Site is within EA Groundwater Source Protection Zone 1	✓		✓
	Site is within EA Groundwater Source Protection Zone 2	✓		✓
	Site is within EA Groundwater Source Protection Zone 3	✓		✓
Flood risk	Site is outside of areas that have historically flooded or at a medium risk to flooding	✓		
	Site is within areas that have historically flooded or at a medium risk to flooding	✓		

Criteria		Source		
		Desktop	Survey	Stakeholders
Potential impacts				
Conservation Areas / Areas of Townscape Character	Development would not have a negative impact on Conservation Area and Areas of Townscape Character	✓	✓	
	Development would not have a negative impact on Areas of Townscape Character	✓	✓	
	Development would have a negative impact on Areas of Townscape Character	✓	✓	
	Development would have a negative impact on Conservation Areas and Areas of Townscape Character	✓	✓	
Listed buildings	Development will not affect listed building/s	✓	✓	✓
	Development may potentially affect listed building/s - mitigation may be necessary	✓	✓	✓
	Development would severely affect a listed building	✓	✓	✓
Landscape Capacity (see Landscape Capacity Study 2007)	Site is within an area identified as having >High 'Landscape Capacity'	✓	✓	
	Site is within an area identified as having >Medium - <High 'Landscape Capacity'	✓	✓	
	Site is within an area identified as having <Medium 'Landscape Capacity'	✓	✓	
Environmental Conditions				
Noise (see PPG 24 for guidance)	Site is unaffected by significant road or rail noise	✓	✓	
	Site is affected by road or rail noise - mitigation necessary	✓	✓	
	Site is severely affected by road and rail noise	✓	✓	
Neighbouring land-use	Site is unaffected by unneighbourly uses (i.e. factory, retail use with late deliveries)	✓	✓	
	Site is affected by unneighbourly use	✓	✓	

Availability				
Criteria		Source		
		Desktop	Survey	Stakeholders
Planning status	The site has outstanding planning permission	✓		
	Site has been subject to pre-application enquiry/ meeting	✓		
	Site does not have outstanding permission but may have lapsed consent	✓		
	Site has previously unsuccessfully applied for planning consent for residential development	✓		
	Site has previously been unsuccessfully submitted for residential allocation as part of LDF	✓		
	Site has previously been unsuccessfully submitted for residential allocation as part of Local Plan	✓		
	The site does not have planning permission for residential development	✓		
Control of site	Developer has legal interest in the land (i.e. option, conditional contract, promotion agreement)			✓
	Site is controlled by Mid Sussex District Council	✓		✓
	Site is controlled by West Sussex County Council			✓
	Site is controlled by land owner (either public or private body)			✓
	Control of site is unknown			✓
Intention to develop	Controller of site has expressed intention to make the site available within the next 5 years			✓
	Controller of site has expressed intention to make the site available between 5 and 10 years			✓
	Controller of site has expressed intention to make the site available between 10 and 15 years			✓
	Controller of site has expressed intention to make the site available after 15 years			✓
	Controller of site has expressed intention to develop but has not set out timescale of development			✓
	Controller of site has no intention to make site available			✓

Criteria		Source		
		Desktop	Survey	Stakeholders
Ownership of site	The site is in single ownership	✓		✓
	The site is in multiple ownership but a co-ordinated approach to development can be demonstrated either through a partnership approach or through a single developer	✓		✓
	The site is in multiple ownership	✓		✓
	Access to the site is controlled by an land ownership issue (i.e. ransom strip)	✓		✓
Legal constraints (covenants, tenancies etc.)	Availability of the site is unconstrained by any known legal matter			✓
	It is unknown if there are any legal constraints on the site			✓
	Availability of the site could potentially be affected by a legal matter			✓

Achievability					
Criteria		Source			
		Desktop	Survey	Stakeholders	Panel
Market factors					
Adjacent land uses	The land uses adjacent to the site are likely to have a positive affect on the marketability of the site		✓	✓	✓
	The land uses adjacent to the site are likely to have a neutral affect on the marketability of the site		✓	✓	✓
	The land uses adjacent to the site are likely to have a negative affect on the marketability of the site		✓	✓	✓
Economic viability of existing use of site	The economic viability of the existing use of the site makes residential development an attractive option		✓	✓	✓

Criteria		Source			
		Desktop	Survey	Stakeholders	Panel
	No accurate judgement can be made on the economic viability of the existing use of the site		✓	✓	✓
	The economic viability of the existing use of the site makes residential development an unattractive option		✓	✓	✓
Economic viability of alternative use of site	Residential development is the most attractive option for development of the site		✓	✓	✓
	No accurate judgement can be made on the economic viability of alternative uses of the site		✓	✓	✓
	The economic viability of an alternative use of the site makes residential use an unattractive option		✓	✓	✓
Attractiveness of location	The location of the site is likely to have a positive effect on the marketability of a development		✓	✓	✓
	The location of the site is likely to have a neutral effect on the marketability of a development		✓	✓	✓
	The location of the site is likely to have a negative effect on the marketability of a development		✓	✓	✓
Level of market demand and projected rate of sales	Market demand is high in this location for the proposed type of housing development		✓	✓	✓
	Market demand is fair in this location for the proposed type of housing development		✓	✓	✓
	Market demand is low in this location for the proposed type of housing development		✓	✓	✓

Criteria		Source			
		Desktop	Survey	Stakeholders	Panel
Cost factors					
Site preparation costs relating to physical constraints	Site preparation costs are judged to be comparatively low		✓	✓	✓
	Site preparation costs are judged to be average		✓	✓	✓
	Site preparation costs are judged to be high		✓	✓	✓
	Site preparation costs are judged to be at a level to severely affect achievability		✓	✓	✓
Exceptional works necessary to realise development	No exceptional works are necessary		✓	✓	✓
	Exceptional works will be necessary to bring this site forward		✓	✓	✓
Planning design standards or obligations	There are no relevant planning design standards or obligations that add significant cost to the development		✓		✓
	Relevant planning design standards or obligations apply that will add significant cost to the development		✓		✓
Funding or investment options available to address identified constraints or assist development	No funding or investment is required to overcome constraints or assist development		✓	✓	✓
	Funding or investment is available to overcome identified constraints or to assist development		✓	✓	✓
	Funding or investment is unavailable to overcome identified constraints or to assist development		✓	✓	✓
Delivery factors					
Phasing of development (see also intention to development)	Development of the site is likely to be undertaken in a single phase		✓	✓	
	No information is available regarding the phasing of development		✓	✓	
	Delivery of the site is likely to be undertaken through multiple phases		✓	✓	

Criteria		Source			
		Desktop	Survey	Stakeholders	Panel
Developer involvement in delivery	Development is likely to be undertaken by single development company			✓	
	Development is likely to be delivered by multiple developers			✓	
Necessary infrastructure (see criteria under 'suitability' section)	Necessary infrastructure exists now	✓	✓	✓	✓
	Necessary infrastructure will be available within the next 5 years to permit development of the site	✓	✓	✓	✓
	Necessary infrastructure will be available in between 5 and 10 years to permit development of the site	✓	✓	✓	✓
	Necessary infrastructure will be available in between 10 and 15 years to permit development of the site	✓	✓	✓	✓
	Necessary infrastructure will not be available until after 15 years to permit development of the site	✓	✓	✓	✓
	No timescale is available for when the necessary infrastructure will be available to permit development	✓	✓	✓	✓
	It is unlikely that the necessary infrastructure to permit development will not be available for a extensive length of time to permit development	✓	✓	✓	✓

Appendix D – Terms of reference for developer workshop

Aims and ground rules

1. To review the Strategic Housing Land Availability Assessment (hereafter referred to as the Assessment) and, where possible, reach agreement on the consistency of the methodology and on anticipated delivery rates and windfall allowances.
2. Where agreement cannot be reached on particular issues (i.e. methodologies, data sources used and/or the interpretation of findings) participants will be expected to clearly identify the outstanding differences and specify what steps they consider should be taken to address the issue.
3. The aim of the workshop is to consider the general soundness of the SHLAA rather than to discuss specific site-related issues, except insofar as these may have a direct bearing on the overall soundness of the SHLAA.
4. Views should be expressed in an open and cooperative manner.
5. Speakers should wait to be called by the chair and not talk over another speaker.

Appendix E – Notes from Developer Workshop

HOUSING LAND SUPPLY DEVELOPERS' WORKSHOP

Tuesday 13th January 2015 at 10am
Mid Sussex District Council, Haywards Heath

MEETING NOTES

Present:

Peter Burley - Independent Planning Consultant (Chair)

Claire Tester – Head of Economic Promotion and Planning, Mid Sussex District Council

Alice Henstock – Senior Planning Officer, Mid Sussex District Council

John Cheston – District Plan Project Manager, Mid Sussex District Council

Judith Ashton - Judith Ashton Associates

Sunita Aujla – Affinity Sutton

Mark Best – Parker Dann

David Bradley – Barton Willmore

Howard Courtley – Courtley Consultants Ltd

Jade Evans – Woolf Bond Planning on behalf of Taylor Wimpey Southern Counties

Sarah Heron – Rydon Homes

Nigel Pugsley – Terence O'Rourke Ltd (part)

Peter Rainier – DMH Stallard

John Rhodes – Quod on behalf of Mayfield Market Towns Ltd

Matt Richardson – Gleeson Strategic Land

Asher Ross – Boyer Planning on behalf of Thakeham Homes

1. Aims

Peter Burley explained that the purpose of the workshop was to inform the Council's SHLAA and preparation of its District Plan by agreeing the underlying methodology for housing supply proposed by the Council. The discussion would be structured around four key questions:

- Does the SHLAA methodology meet the requirements of the Planning Practice Guidance?
- Are the typologies of site used to inform the SHLAA assessments correct or have market conditions or other delivery factors changed?
- Is the commitment schedule for years 1 - 5 of the Plan period realistic?
- What are participants' views on the assumptions made for the windfall allowance?

2. Council's opening comments

Claire Tester provided an overview of the work undertaken to date on the District Plan and SHLAA. She highlighted that the Consultation Draft District Plan did not currently contain a housing provision number or OAN figure as the Council were awaiting evidence on DCLG household projections and had commissioned LUC to undertake a sustainability assessment of neighbouring authorities' unmet needs. Around 30 new sites had been received as a result of a call for sites in summer 2014 bringing the total number of sites in the SHLAA to around 500. LUC were undertaking an audit of site assessments with a focus on landscape impacts. The SHLAA methodology had evolved over time and the Council were looking for participants to input on the mechanics of the current and future housing market.

The Council circulated copies of a letter from Julia Jardine (Terence O' Rourke Ltd) who was unable to attend but had raised several points.

Alice Henstock detailed the timetable for the SHLAA which would be published in draft alongside papers for Council meetings in March and would be finalised once 2014/15 housing completions had been accounted for (May/June).

3. Does the SHLAA methodology meet the requirements of the Planning Practice Guidance?

Areas excluded from assessment

Participants queried the approach of excluding entirely areas of high value open space, local nature reserves and sites of nature conservation importance from the assessment. They suggested that, whilst they may well be unsuitable, in some cases such sites may be suitable on balance. One participant highlighted that some open spaces may have 'visual amenity' value but no public access and could potentially be suitable. The Chairman suggested that there may be a distinction to be made between local interest exclusions and nationally important sites such as SSSIs.

Access to services

Some participants highlighted that larger sites may be able to provide services on site. Alice Henstock said that opportunities to improve sustainability were acknowledged in the commentary accompanying each site assessment.

Overcoming identified constraints

There was some discussion around constraints that could reasonably be overcome and how this could be considered and reflected in the final SHLAA. Alice Henstock said that the District Council and County Council lacked the resources to look at every site in detail and the assessments relied on the best information available. Participants suggested that the Council should give a further opportunity for those promoting the site to submit further evidence about how the identified constraints could be overcome prior to the SHLAA being finalised. A participant pointed out that the NPPG is clear that SHLAA methodologies should seek to test previously accepted constraints rather than simply accept them. Positively looking at how any constraints could be overcome is critical to a SHLAA methodology complying with the guidance in the PPG. The SHLAA methodology is revised to deal with this issue.

Sites wholly unrelated to existing settlements

A participant asked for clarity that new settlements incorporating necessary services and facilities would not be excluded from assessment due to being unrelated to existing settlements. Alice Henstock gave assurance that new settlement sites would be assessed and wording could be added to make this clear, in Appendix C - Assessment template of the methodology.

4. Are the typologies of site used to inform the SHLAA assessments correct or have market conditions or other delivery factors changed?

Market factors

Participants suggested that the Mid Sussex market could absorb a large number of similar sites coming forward in villages simultaneously (Category 4). It was also highlighted that the suggestion that greenfield extension sites (Category 6) might be 'sat-on' was not relevant under current market conditions.

Delivery factors

Participants questioned the 2-year delivery timeframe identified for greenfield extension sites as larger sites would likely require outline and reserved matters permissions and contamination or ecology issues could cause significant delays. It was suggested that the Council did further work on looking at historical delivery rates to inform these figures. Developers were unable to give more detailed information.

The site ceiling of 300 units per year for greenfield extension sites was considered to be excessively high. A rate of 50 per year for a single builder and 75/100 if there are 2 builders on site was felt to be more realistic. It was also suggested that multiple house builders on a single site would not necessarily result in a commensurate increase in delivery rates. However, it was noted that exceptions may apply in the case of some major sites where the quantum of development could allow for higher delivery rates than could typically be achieved elsewhere, but this would need to be clearly evidenced (possibly through evidence of delivery rates at similar sites in the area) and rates would vary over the course of development.

Clarity around how categories would be used

Some participants were unclear how the categories would inform assessments and suggested that setting thresholds between categories was unnecessary. Some participants suggested that Category 4 (Village Greenfield – edge of settlement) and Category 5 (Town Extension – greenfield non-strategic) could be combined as the same factors would be relevant for both. Alice Henstock explained that they were used as a template for completing the site assessments, to ensure consistency across typologies of sites.

Additional minor points

- Participants highlighted that category 4 referred to affordable housing provision but no other category had addressed this and it was agreed that this should not be included in the typologies
- There was some inconsistency in the criteria covered between categories
- A participant raised the issue of 'concerns over sustainability of edge of town locations' in relation to Category 5 - Town Extension (Greenfield Non-Strategic). Such a concern would equally apply to category 4 (logically more so) and category 5. (In typologies list)
- One participant made the point that para 6.20 of the LUC: Capacity of Mid Sussex District to accommodate development document specifically refers to the edges of the District's main settlements that are the more sustainable settlements.

5. Is the commitment schedule for years 1 – 5 of the Plan period realistic?

Sites with lapsed permissions

In response to participants' queries, Alice Henstock said that the schedule would be updated to remove sites where permission had lapsed.

Sites with delivery issues

Participants raised concerns about whether the following sites could be delivered in the first five years:

- Rookery Farm, Haywards Heath: standing issue around land ownership
- Clock Field, Turners Hill: emerging Neighbourhood Plan allocation tied to this site
- Premier House, Garland Road, East Grinstead: recent new occupier
- Covers Timber Yard, 107 Fairfield Road, Burgess Hill: existing occupier seeking an alternative site
- East of Kings Way, Burgess Hill: unsure if 300 homes built was realistic
- Keymer Tile Works, Burgess Hill: queried whether the site was likely to be delivered
- 17 – 25 Boltro Road, Haywards Heath: committed for many years

Alice Henstock said that there had been pre-application discussions on Rookery Farm in the last year, access issues needed to be resolved at Clock Field, a reserved matters application had been submitted for Keymer Tile Works. As general comments, participants said that it would be useful for the schedule to show the total number of units permitted and, for outline permissions, where reserved matters had also been approved. (Note: The information was given in this form for the purpose of the workshop; full commitments lists are published on the Council web site as part of the monitoring report.)

Burgess Hill Northern Arc delivery rates

Alice Henstock said that the housing trajectory also assumed 260 units a year on the Northern Arc site in years 6 – 10 and 320 units a year beyond that. She asked for participants' views on the assumed rate of delivery. Predicted delivery rates for the Northern Arc should be tested against actual delivery rates of other strategic development in the area.

6. What are the participants' views on the assumptions made for the windfall allowance?

Alice Henstock explained that the study had been prepared with no judgements on what the housing provision figure would be or how the predicted windfall rates would be used. John Cheston said that the Council was hopeful that windfall sites would act as a contingency rather than be relied upon for supply.

Participants highlighted that historic windfall rates would be influenced and inflated by the absence of a five –year supply and the lack of an adopted Plan. The allowance appeared high, particularly when compared to a windfall allowance in Horsham of 50 units a year.

Alice Henstock said that these figures were based on completions and so sites permitted as a consequence of the five-year supply position were unlikely to have been completed.

7. Concluding remarks

Participants made the point that the LPA timetable for the DP progression was unrealistic and that proper consideration of representations should take place between publication of the housing figures/location strategy and the examination.

Participants raised concerns with Neighbourhood Plans progressing ahead of the District Plan without up-to-date SHLAA and OAN evidence available and suggested that strategic needs were failing to be delivered through Neighbourhood Planning. They suggested that the District Plan should include a settlement hierarchy and/or provide strategic guidance on the distribution of new homes.

John Cheston thanked all participants for their input and said that it was useful to have an informal opportunity to hear views from the development industry.

Peter Burley thanked everyone for their contributions.

John Cheston
District Plan Project Manager
Planning Policy and Economic Development
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex RH16 1SS

12 January 2015

Dear Mr Cheston,

Housing land supply – developers' workshop, 13 January 2015

Thank you for the circulation of papers in relation to the above workshop. Having reviewed the content of these and the topics that are for discussion on Tuesday, our Client does not consider it essential to attend the workshop, but appreciates the opportunity to make the following comments, and trusts that these will be handed to Mr Burley in advance of the workshop.

St Modwen is pleased to see that the **commitment schedule** has been updated to reflect the current status of the site north of the A264 at Junction 10 of the M23 in Copthorne, Worth Parish (SHLAA site 38). However, the figure of 150 homes against delivery in years 1-5 is considered conservative, and could be in the region of 300 out of the total of 500 homes.

It is considered important that the SHLAA and land supply assessments do not overlook such sites, as these are sites which have been found to be suitable, available, and achievable following extensive pre- and post- submission consultation with statutory consultees, and which MSDC has found to be sustainable and acceptable.

The **Updated Methodology**, January 2015 document should therefore make reference to this category of sites, for example in tables 1 (p7) and 3 (p10) - sources of sites and of information.

St Modwen is concerned that this site (site 38) which is considered favourably within the SHLAA, and which has a resolution to grant permission, has not taken forward in the consultation draft district plan 2014-2031, sustainability appraisal (October 2014) as a Strategic Location Option. There is no reason why this site of 500 homes, which MSDC has resolved to permit, is not the subject of a strategic allocation within the district plan.

Terence O'Rourke

Planning | Design | Environment

St Modwen will be making further comments on the consultation draft district plan and associated documents in due course, but is grateful for this additional opportunity to comment on the approach to the SHLAA.

Please do call me if you have any queries in relation to the above.

Yours sincerely,

A handwritten signature in black ink, reading "Julia Jardine". The signature is written in a cursive, flowing style.

Julia Jardine
Technical Director

cc Colin Darby, St Modwen