

## **Mid Sussex District Plan Examination**

### **Inspector's comments and questions: the effect of constraints on the supply of housing within the plan period**

#### **Agenda for hearings scheduled for 8 and 9 February 2017**

#### **AGENDA**

The following questions consider the matter of constraints on housing supply within the plan period to 2031. ***The site summaries prepared by the Council, the Developers' Forum and Linden Homes may be referred to in order to assist with the hearing discussion, but the overall merits of those sites will not be considered.***

#### **1. Strategic sites**

Q 1.1 The Council considers that there are no further deliverable or developable strategic sites that could be delivered in the plan although they are not ruled out indefinitely. Is this a robust conclusion, given that the plan has a remaining life of 17 years and that certain strategic sites are being promoted by landowners and developers?

Q 1.2 Might this conclusion be different if the threshold for strategic sites were to be lowered?

Q 1.3 Should the existence of one strategic site be a factor in the rejection of another?

#### **2. Deliverability, developability and locations for growth**

Q 2.1 Paragraph 47 of the Framework indicates that the plan should:

- meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the Framework;
- identify key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify a supply of specific deliverable sites sufficient to provide 5 years supply of housing against the housing requirement;
- identify a supply of specific developable sites or broad locations for growth for years 6 to 10 and where possible for years 11 to 15.

Having regard to the above, is it appropriate that the SHLAA site identification process should be so critical to the setting of the 800 dpa requirement, given the length of the plan period and the fact that the Framework clearly allows for increasing flexibility in site identification later in the plan period?

### **3. Number and scale of additional sites required to meet higher housing requirements**

Q 3.1 The Council believes that at 850 dpa would require an additional 40 sites and 900 dpa would require an additional 60 sites. This would appear to point to a relatively small average site size in the range of 20-30 dwellings. Does the Council's analysis incorporate any assessment of the policy choices that could be made either to give greater weight to the bringing forward of larger sites or to spread development around many smaller sites?

### **4. Highways, transport and access constraints**

Q 4.1 The Council considers that provision of 900 dpa would require "a large number" of sites with highways, transport and access issues but accepts that some may be capable of mitigation. To what extent does the Council's overall analysis of deliverable and developable sites, derived from the SHLAA, distinguish between the different types of transport constraint (which might range from resolving a site access to dealing with wider issues of traffic on the network), in order to evaluate the nature of the mitigation required and hence the weight to be given to the constraint?

Q 4.2 How much work has been done at the individual site level to assess whether appropriate mitigation measures can be undertaken to allow the site to be delivered?

Q 4.3 To what extent can such mitigation be delivered through planning obligations?

Q 4.4 In the wider context, what work been carried out to demonstrate whether or not CIL from a number of sites has the potential to fund broader highways and transport improvements that might mitigate the cumulative impact of development and help to unlock suitable housing sites? (See also Q 7.1)

### **5. Landscape, heritage and other constraints**

Q5.1 It is noted that in the SHLAA current findings (Table 2, MSDC5a) there are 74 sites (with a very large potential yield

whether or not the rejected strategic sites are included) which are constrained by designations or landscape, and another 19 sites which are considered "constrained" (again with a large potential yield).

These are sites in areas that have been rejected as being in areas with low landscape capacity, or are near heritage assets, ancient woodland, or have on-site issues such as the potential for contamination and so on.

The commentary states that "some" sites have constraints that could not be overcome. That implies that others are capable of mitigation. What assessment has been made of the mitigation measures that could be undertaken to make them acceptable, such as:

- tree planting and landscaping
- lower densities,
- the development of part of the site only to avoid the more visually intrusive or sensitive parts
- the protection of archaeological remains in situ or by record,
- the incorporation of buffers,
- measures to improve biodiversity,
- drainage measures,
- remediation of contamination
- mitigation in respect of air quality
- and so on?

## **6. Sites that might be required in the AONB**

Q 6.1 The Council believes that to meet (as an example) 900 dpa, 12 additional sites would be required within the AONB, accounting for 300 or more units. This suggests an average site size of 25 units. What size (generally speaking) would not be regarded as major development in the AONB? Are some of these sites small extensions to settlements?

Q 6.2 What would be the implication of policy choices to divert some of this number to sites outside the AONB?

Q 6.3 Given that the Council has considered some sites in the AONB suitable, and has granted planning permission for a strategic site there, should the Council's approach be more attuned to the potential visual mitigation of the development rather than rejection of other potentially suitable AONB sites?

## **7. Ashdown Forest SPA/SAC**

Q 7.1 The 7km buffer zone is a question in the hearings due to commence on 28 February. However, has the ability to mitigate the impact on the SPA been taken into account in evaluating site availability and constraints?

## **8. Other social and physical infrastructure constraints**

Q 8.1 What work been carried out to demonstrate whether or not CIL from a number of sites has the potential to fund broader improvements to education and other social facilities, or to drainage, sewage and other infrastructure, that might mitigate the cumulative impact of development and help to unlock suitable housing sites? (See also Q 4.4)

## **9. Consistency of approach**

Q 9.1 How consistent is the site selection methodology given the inclusion of some sites and the rejection of others in similar positions?

## **10. Relationship between short term and longer term delivery, and potential courses of action**

Q 10.1 The Council believes that there are not enough existing or potential sites to meet a provision higher than 800 dpa in the first 5 years, and that if additional sites do come forward they are likely simply to improve the robustness of the 5 year housing land supply. If OAN and unmet need were to indicate a requirement higher than 800 dpa over the 17 year life of the plan, but the 5 year supply position is constrained as described by the Council, what positive approaches might be adopted towards:

- (a) the planned trajectory?
- (b) the 5 year supply calculation methodology?
- (c) the Site Allocations Plan?
- (d) a plan review in the near future that raises the requirement?

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