

MSDC 6: Strategic Housing Land Availability Assessment - Test of Sites Paper

Introduction and Context

In line with the Inspector's request, this note provides a summary of the SHLAA assessment of 5 sites by the Council. In assessing the SHLAA the Council notes:

- 1. The Inspector's attention is drawn to the Council's comments on the SHLAA set out in section 3(1) of MSDC 1. This refers to the development of the methodology for the SHLAA, the review of the assessments already undertaken and the onus on developers to indicate how constraints can be overcome, given the limited resources of small district council. The Council notes also that a session on the methodology for the SHLAA was facilitated by Peter Burley (Planning Consultant, former Chief Planning Inspector) and agreed by the developers present. The SHLAA assessments have also been published on the Council's website for a number of years prior to the plan's submission and open to comment.**
- 2. The NPPF (para 159) requires the authority to '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'.**
- 3. The PPG states that the assessment is an important step in the preparation of Local Plans. It is not a Development Management tool.**
- 4. The April 2016 SHLAA has been prepared in accordance with the methodology set out in the PPG. The methodology has been subject to input from external organisations/ developers as documented in the SHLAA (2016) appendices 1 and 2.**
- 5. The PPG requires site surveys to be proportionate to the detail required for a robust appraisal. For example the assessment will need to be more detailed where sites are considered to be realistic candidates for development (para 15).**
- 6. Each SHLAA assessment provides further details on the constraints/actions required. The PPG does not require local authorities to undertake the actions required to overcome these constraints.**
- 7. The District Council published its first SHLAA in 2009. The SHLAA has been reviewed annually since then.**
- 8. The last call for sites was in 2014. However, the SHLAA is never closed for submission of new sites/evidence. A further 47 sites have been added to the SHLAA since the close of the last call for sites. This includes sites that have come forward through the preparation of Neighbourhood Plans.**
- 9. The SHLAA has been prepared separately from the calculation of the OAN for Mid Sussex.**
- 10. The District Council submitted what it considered to be a sound plan that included a housing requirement that exceeded its OAN. The SHLAA demonstrated a palette of sites that could meet this housing requirement. Therefore there was no need for the Council to revisit the assessment as detailed by para 26 of the PPG.**
- 11. The Council believes the SHLAA is fit for purpose in terms of guidance in the NPPG, PPG and practice elsewhere for SHLAAs. If the Inspector concludes otherwise then the Council requests an explanation and any specific remedial actions needed.**
- 12. The Council accepts that the SHLAA is a live document and that the circumstances of sites in terms of availability, suitability and achievability are in a state of evolution. In seeking to address housing needs in the plan and a future sites allocation DPD, the Council will take account of current circumstances.**

Site Ref	17	L/A Great Harwood Farm House off Harwoods Lane, East Grinstead	
Gross site area	56 hectares (15 net)	Potential Yield	600
Date first in SHLAA	Dec 2008		
Latest submission	June 2014	Masterplans submitted to District Plan Examination – November 2016	

Site Available	Yes	Submitted by proponent
Site Achievable	Yes	Development on this site is considered achievable

Site Suitable	No
SHLAA assessment	Review
The site has low landscape suitability for development. The site is a relatively complex mosaic of undulating landscape, ancient woodlands and views to other parts of the AONB as well as being within the AONB itself. The site makes a contribution to the wider setting of East Grinstead. The northern corner is on a plateau but the remainder of the site forms undulating grounds of the river valley (LUC Assessment). Overall, the site makes a positive contribution to the AONB and development of such a large site would represent a significant intrusion to the detriment of the AONB.	Evidence: LUC (2015) Low landscape capacity indicates that development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development. The site is in open countryside. No evidence has been produced that demonstrates that a development proposal, including a reduced area, would have regard for existing features and sensitivities within the landscape thereby mitigating the impact of development on the landscape. No evidence that there are exceptional circumstances for development on this site in the AONB that on balance, outweigh the significant and adverse harm on the AONB.
Contains multiple and separate areas of designated Ancient Woodland. The location and position of some of these woodlands would severely restrict the connectivity and access to parts of the site.	Evidence: Ancient Woodland Survey Areas of Ancient Woodland can be excluded from the development area, but may cause site to not relate well to existing settlement and result in fragmented development.
Capacity of the site is likely to be determined by transport constraints that exist across the whole town.	Evidence: Atkins Study of Highway Network in East Grinstead. Mid Sussex Transport Study The transport constraints in East Grinstead are well documented. There is no evidence that the development of this site will be acceptable in highway terms on the local and wider road network in East Grinstead.

Constraints/Actions required	Review
SHLAA assessment	Review
AONB location - requirement to demonstrate essential for local need and that no more suitable sites exist elsewhere. Archaeological and historic landscape character assessment needed.	No evidence that there are exceptional circumstances for development on this site in the AONB that on balance, outweigh the significant and adverse harm on the AONB.
Location of areas of ancient woodland is likely to severely limit the connectivity and access to parts of the site. Significant impact likely - mitigation/ compensation will be essential. Recreation impact to be reduced on ancient woodlands.	Areas of Ancient Woodland can be excluded from the development area, but may cause site to not relate well to existing settlement and result in fragmented development.
Ghyll woodland, waterways, bats and rare species to be protected - retain, protect and enhance features	Evidence will need to be submitted to ensure features and species are retained, protected and enhanced.
Capacity of the site is likely to be determined by transport constraints. Current ceiling estimated to be 190 homes for the whole town but this may be tested by further transport work.	Further evidence required, including the impact of existing development proposals at East Grinstead..
Site is within 7km of Ashdown Forest.	SANG and SAMM mitigation/ contribution.
Would require allocation through relevant Neighbourhood Plan or DPD.	Site is a greenfield site and would require allocation.

Summary

The site has been assessed as being unsuitable for development for the following reasons:

- AONB location
- Low landscape capacity for development
- Unresolved transport constraints on the local and wider road network in East Grinstead
- Connectivity to existing built up area

Site Ref	18	Crabbet Park, Old Hollow, Near Crawley	
Gross site area	174 (Hec) 100 (net)	Potential Yield	2,300
Date first in SHLAA	2008		
Latest submission		No representation to District Plan	

Site Available	Yes	Based on evidence previously submitted and comments of the planning agent the site is considered available.
Site Achievable	No	Significant infrastructure constraints need to be addressed before the site can be considered achievable.

Site Suitable	No
SHLAA assessment	Review
The availability of sewerage infrastructure is a major issue for this site. Although proposal for onsite treatment has been put forward by the site promoter, MSDC have not had confirmation from Thames Water or Environment Agency this would be acceptable.	Sewage infrastructure is a major constraint on the suitability of this site. There are known capacity issues at the Crawley Waste Water Treatment Works. No evidence has been supplied to demonstrate that this issue can be overcome within the plan period and resolve that concerns raised by Thames Water and the Environment Agency.
The impact of this site on the Strategic road network is considered to be significant.	Evidence: At Crawley Study (2009) Considered the in combination impact of the development of 3 strategic sites at Crawley. Significant highway works would be required, including a potential western relief road to Crawley. 2 strategic sites are already under construction at Crawley. Access from the site to the SRN (Junction 10 M23) will have an impact on congested roads and junctions on the local road network.
The majority of the site is considered to have low landscape suitability for development. This is due to the landscapes proximity to the AONB and key landscape characteristics, ancient woodland blocks and historic time depth including assarts, as well as the site forming a buffer between the settlements of Crawley and Copthorne. There are smaller areas which are less sensitive in landscape terms to development (LUC Assessment). However, this would result in isolated pockets of development, unrelated to existing development and services.	Evidence: LUC (2015) Low landscape capacity indicates that development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development. There are smaller pockets of the site that have been identified as having low – medium suitability for development. This rating indicates that development is likely to have an adverse effect on most of the character area, it will not be suitable for strategic scale development. No evidence has been produced that demonstrates that a development proposal would have regard for existing features and sensitivities within the landscape thereby mitigating the impact of development on the landscape.
Site remote from any Mid Sussex settlements and separated from Crawley by the A/M23, which would make it difficult to integrate into the existing town.	The integration of the site into existing settlements will need careful consideration. The development of the smaller land parcels that have some potential to accommodate development in landscape terms would not be capable of integrating into existing settlement pattern, resulting in isolated pockets of development.
Southern area of site within AONB.	The southern part of the site is within the High Weald AONB. Whilst this land can be excluded from the developable area of the site, consideration will need to be given to the proximity of the AONB.
Several listed buildings lie adjacent to site boundaries, particularly of note the Grade II* buildings on Crabbet Park.	Consideration will need to be given to the setting of the listed buildings within the site.
The site is remote from existing services, facilities and schools although these may be provided as part of	A strategic development at this site will need to make adequate on site provision of the necessary services and

strategic development.	facilities to ensure the development is sustainable and does not put additional pressure on existing services.
Areas of ancient woodland would need to be preserved and buffered.	This can be incorporated into the master planning of the site.
Drainage attenuation measures needed.	This can be incorporated into the master planning of the site.

Constraints/Actions required	
SHLAA assessment	Review
Would need to consider the implications of the "At Crawley Study" (2009). Additional issues that require consideration on a cross authority basis are the ability of Crawley to assimilate potentially 3 new neighbourhoods as well as growth within the town centre.	Two new neighbourhoods are currently under construction on the eastern and western sides of Crawley. As well as strategic site at Pease Pottage.
A Crawley-wide water cycle study may be necessary to inform development levels at Crawley. Wider improvements to sewage works in the Crawley area would be required prior to any strategic development in this location - site is therefore not considered achievable until 2021.	There are significant concerns that waste water infrastructure will not be available to serve this development. There is no evidence that this issue can be addressed within the plan period.
Significant improvements to the highway network would also be required to facilitate this development in addition to the strategic development already given consent at Crawley.	There are significant concerns about the impact that a strategic development would have on the local and strategic highway network. There is no evidence that this issue can be addressed.
Would require allocation through relevant Neighbourhood Plan or DPD.	Site is a greenfield site and would require allocation.

Summary

The site has been assessed as being unsuitable for development for the following reasons:

- Low landscape capacity for the majority of the site and an absence of mitigation proposals
- Waste Water Treatment Works – insufficient current capacity
- Highway Network – insufficient current capacity
- The impact of 3 new neighbourhoods 'At Crawley' on the community structure and cohesion

SHLAA testing

Site Ref	61	Land to the north of Copthorne Road, Copthorne	
Gross site area	16.8 hectares (8 net)	Potential Yield	240
Date first in SHLAA	Dec 2008		
Latest submission	Pre 2012		

Site Available	No	No evidence that this site is available for development. Multiple ownership.
Site Achievable	No	No evidence that Waste Water Treatment Works have sufficient capacity to deal with site. No evidence that the development of this site is viable taking into account the number of land parcels.

Site Suitable	No
SHLAA assessment	Review
Site is poorly related to existing settlements of Copthorne therefore poor access to local services.	Site remains poorly related to existing settlement. Linear, westward extension does not represent a logical expansion to village.
Separated from Copthorne by major road which will make access on foot hazardous.	Major junction on A264 will need to be crossed to access Copthorne village and its services. Site separated from Crawley by M23, whilst there is a footpath across it is detached from settlement.
Large part of the site is ancient woodland.	Evidence: Ancient Woodland Survey Large sections of AW and buffer areas severely limits the developable area of the site.

Constraints/Actions required	
SHLAA assessment	Review
Ancient woodland buffer required. Important to retain and enhance boundary features.	Could be incorporated in masterplan, however will severely restrict developable area and
Site compromises a triangle of land between Copthorne Road and A264. Virtually all the land compromises the curtilages of about 27 large properties	No evidence of land assembly. Multiple ownerships may impact on viability.
Development at this site would prove an unsustainable extension to the village, moving beyond the settlements existent defensible boundaries, harmful to the rural appearance of the area, and unsustainable in terms of access to services and facilities.	Not a logical expansion to Copthorne village, this would be difficult to overcome to avoid an isolated, unsustainable development.
Would require allocation through relevant Neighbourhood Plan or DPD.	Site is a greenfield site and would require allocation.

Summary

The site has been assessed as being unsuitable for development for the following reasons:

- No recent evidence that the site is available for development
- No evidence that it would be financially viable to develop the site
- Site not related to existing settlements
- Poor access to local services on foot.

Therefore, based on the evidence provided the site remains unsuitable for development.

Site Ref	665	Hangerwood Farm, Foxhole Lane, Bolney	
Gross site area	8.9 (hec) 5 (net)	Potential Yield	100
Date first in SHLAA	June 2014		
Latest submission	June 2014		

Site Available	Yes	Site is available.
Site Achievable	Yes	Development on this site is considered achievable.

Site Suitable	No
SHLAA assessment	Review
Most of the site has low landscape suitability for development. The northern end represents too much of an expansion away from existing settlement into a rural area, and the western field is separated from the rest of the site by a wooded stream corridor. Area A is considered to have medium landscape suitability for development. It could accommodate a low - medium yield, forming an extension to Crosspost. There is potential to enhance the stream corridor through planting and landscape management (LUC Assessment).	<p>Evidence: LUC (2015) Low landscape capacity indicates that development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development.</p> <p>Part of the site has medium landscape suitability for development. This indicates that there is potential for limited smaller-scale development to be located in some parts of the character area, so long as there is regard for existing features and sensitivities within the landscape.</p> <p>This site is in open countryside. No evidence has been produced that demonstrates that a development proposal would have regard for existing features and sensitivities within the landscape thereby mitigating the impact of development on the landscape.</p>
Whilst the site is in reasonable proximity to limited local services (e.g. school) within Bolney village centre, there is limited pedestrian access - a footpath along Cowfold Road to connect the site would be required.	<p>Lack of footpath or adjacent PROW into the village centre to access services. This severely reduces the sustainability of the site.</p> <p>No evidence has been submitted to demonstrate that a footpath can be delivered that will enable the village centre to be accessed on foot in a safe and satisfactory manner.</p>
Access is proposed onto Foxhole lane, which joins the A272. It is unclear if Foxhole lane/ junction with A272 is suitable to serve a large scale development.	A272 is a major east-west route. There is no evidence that satisfactory access onto the highway network can be achieved. It is possible that a new roundabout may be required to serve the site but no evidence that this could be delivered within available land.
The site is detached from the built-up area of Bolney and would be an un-natural extension of Bolney into the countryside, so is therefore not suitable. This could be revised should the southern section of site 617 come forward for development.	Development at this location would result in a development that is a disjointed, un-natural extension to the village. This in itself is not capable of mitigation.
The centre of the site is within Flood Zone 3 which would cut the site in half, this would render the western portion of the site undevelopable as it would be severed from the rest of the development and Bolney village.	Evidence SFRA/ Flood zone maps. This does not rule out but reduces the developable area of the site.

Constraints/Actions required	Review
SHLAA assessment	Review
Yield should be considered the maximum potential; a significantly lower yield may be appropriate for the village.	A smaller site area may be suitable for development, but the sustainability issues associated with this site including lack of connectivity to the village centre would still be relevant. Access issues would also need to be overcome.
Would require allocation through relevant Neighbourhood Plan or DPD.	Site is a greenfield site and would require allocation.

Summary

The site has been assessed as being unsuitable for development for the following reasons:

- No recent evidence that the site is available for development
- No evidence that it would be financially viable to develop the site
- Site not related to existing settlements
- Poor access to local services on foot

Site Ref	742	Russell Nursery, Hurst Road, Hassocks	
Gross site area	3.46 (Hec) 2 (net)	Potential Yield	60
Date first in SHLAA	Sept 2015		
Latest submission			

Site Available	Yes	Site is available for development.
Site Achievable	Yes	Development on this site is considered achievable.

Site Suitable	No
SHLAA assessment	Review
The site lies to the western side of Hassocks village. The site has previously been in use as nursery and there are buildings on the site associated with this use. The north western side of the site is covered by Tree Preservation Order. There are ponds and water features along the southern boundary of the site. The site is in close proximity to the Stonepound Crossroads AQMA and the development at this site may impact upon air quality unless it can be mitigated.	Evidence: Hassocks AQMA management plan No evidence has been provided that the impact of the development on the AQMA can be mitigated.
The South Downs National Park boundary lies run along the southern boundary of the site and development at this location may have a detrimental impact on the setting of the National Park. Careful consideration will need to be given to the impact of the development on the wider landscape	This site is in open countryside. No evidence that the development will not have a detrimental impact of the setting of the South Downs National Park. A full landscape and Visual Impact Assessment would be required to determine such impact. Comments received from the SDNP state that the site has the potential to impact on the setting of the SDNP, the site is currently green open space that helps maintain the important 'green' transitions from built development up to the boundary of the SDNP ; the principle of such transitional value has been sustained by PINS at appeal.
Access to the site is proposed to the side of a property fronting Hurst Road. Whilst the site is well located for local facilities and services there is no footpath along this side of Hurst Road at this location which will make journeys by foot less attractive.	No evidence has been provided to demonstrate that a footpath can be provided on the southern side of Hurst Road to make journey's on foot into the village centre more attractive. Hurst Road is a busy east west route and crossing the road to reach the footpath opposite will not be an attractive option. There is no evidence that this site is acceptable in highway terms.

Constraints/Actions required	Review
SHLAA assessment	Review
Consideration would need to be given to the impact on the setting of the South Down National Park.	Evidence would be required to establish that the development will not have an adverse impact on the setting of the National Park
Mitigation of the impact on the AQMA. Access onto Hurst Road.	Evidence would be required to established that the impact of the development on the AQMA can be mitigated.
Lack of pedestrian links to village centre.	Action required to improve accessibility of site to the village.
Site would require allocation in the Hassocks Neighbourhood Plan or DPD.	Site is a greenfield site and would require allocation.

Summary

The site has been assessed as being unsuitable for development for the following reasons:

- Setting of the South Down National Park
- Proximity to AQMA
- Lack of footpath to village centre
- No evidence that site is acceptable in highway terms