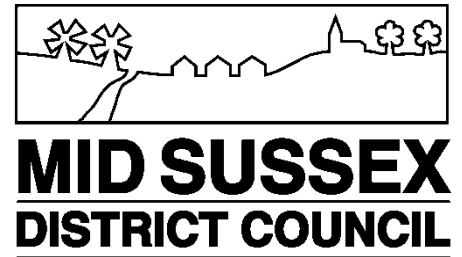


Mid Sussex District Council



Site Allocations Development Plan Document

Site Selection Paper 2 - Methodology for Site Selection

December 2018

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1. Site Selection Paper 2 – Methodology for Site Selection

Introduction

- 1.1. Following the adoption of the Mid Sussex District Plan in March 2018, work has commenced on the preparation of the Site Allocations Development Plan Document. Policy DP4: Housing, commits the Council to preparing a Site Allocations DPD to identify around 2,500 additional residential units.
- 1.2. In order to decide which sites will be allocated for development in the DPD, the Council is carrying out a robust process to identify, assess and score the potential sites. The first stage of that process was to prepare a Strategic Housing and Employment Land Availability Assessment (SHELAA), which sets out the sites which will be considered further through the Site Selection process. The second stage was the assessment of sites against the District Plan Strategy, which was published in Site Selection Paper 1. The next stage will be to assess sites against the proposed methodology set out in this paper.

Purpose of the Paper

- 1.3. The purpose of this paper is to explain the methodology the District Council will follow to select a shortlist of housing and employment sites from the long list for inclusion in the Site Allocations DPD Regulation 18 consultation.
- 1.4. The methodology has been considered by the Site Allocations Working Group, representatives from the development industry via the Developer Liaison Group and Town and Parish Councils. The methodology for the Site Selection Process as a whole has also been considered by the Scrutiny Committee for Community, Housing and Planning.

Background

- 1.5. A palette of potential housing and employment sites has been identified through the preparation of the Strategic Housing and Employment Land Availability Assessment. On the 25th September 2018, the Scrutiny Committee for Community, Housing and Planning considered a report and accompanying paper that set out how the palette of housing sites had been assessed against the District Plan Strategy (Site Selection Paper 1). As a result of this work 91 sites were classified as not complying with District Plan Strategy and will therefore not be considered further for the purposes of preparing the Site Allocations DPD. There are 146 housing sites and 95 employment sites remaining in the palette of sites for consideration.
- 1.6. A high-level site selection methodology was previously considered by the Scrutiny Committee in January 2017. This methodology has been developed further within Site Selection Paper 2 to provide a clear process for selecting the most suitable and sustainable sites.
- 1.7. Officers will use this methodology, working with the Site Allocations Working Group to undertake the site selection exercise. The outcome of this work will inform the content of the Regulation 18 Consultation documents that will be published in Summer 2019.
- 1.8. There are different factors to consider when selecting a housing site compared to an employment site. For example, criteria relating to distance to education/health will be important considerations when assessing the suitability and sustainability of a housing site, but less important for an employment site. Similarly, proximity to labour force and

attractiveness to the market will be important factors for an employment site. Therefore, in line with good practice, housing and employment sites will be subject to their own separate site selection methodologies.

Site Selection – Principles

- 1.9. The site selection criteria have been developed to establish the suitability, availability and deliverability of each site. This includes relevant land designations, constraints, accessibility to services, infrastructure and transport. The ability of each site to contribute to the delivery of the District Plan Strategy through its inclusion in the Site Allocations DPD is also taken into account.¹
- 1.10. The NPPF (2018) states that “*Plans should be prepared with the objective of contributing to the achievement of sustainable development*” and “*be prepared positively, in a way that is aspirational but deliverable*” (NPPF, para 16). It goes on to state that “*Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*” (NPPF, para 67).
- 1.11. The criteria have been designed to enable a comparison of sites against one another with the aim of determining the most sustainable and developable in accordance with the NPPF, which will ensure selection is consistent with the principles of sustainable development and consistent with the policies within the Framework (NPPF, Chapter 2)

Site Assessments - Principles

- 1.12. The impact of each site on each criterion will be measured using the requirements set out in the tables below. The impacts have been drawn from the supporting evidence base and through liaison with stakeholders and statutory consultees. The source(s) of evidence which inform the assessment are listed under the criteria in sections 3 and 5.
- 1.13. The assessments will also be based on information provided by the site promoter up until the point of assessment. The Council welcomes the submission of any evidence/technical reports/etc that would assist in undertaking the assessment.
- 1.14. It may be possible to improve the impact against certain criteria by mitigating negative impacts. However, in order to provide a consistent approach, it is not for the Council, at this stage, to establish the specific mitigation that would be required in order to improve any negative impacts. However, a high-level assessment will be made as to whether negative impacts could, in theory, be mitigated (for example, Ancient Woodland can be mitigated by the application of a 15m buffer or excluding area from developable area of the site), as already noted in the Site Selection Criteria.
- 1.15. If any specific mitigation measures/infrastructure provision has been provided by site promoters within their site submission or subsequent correspondence since, these will be accounted for when undertaking the assessments. If the promoters don't provide this information it will be assumed that no mitigation/additional infrastructure is to be accounted for within the assessment process. The Council will continue to engage proactively with site promoters to explore mitigation measures, and promoters will have the opportunity to comment and provide further information on mitigation (should it be required) once the initial assessments have been completed.

¹ The assessment criteria uses a similar methodological approach to that used in the Strategic Site Selection Paper, that was prepared to inform the preparation of the Mid Sussex District Plan (EP23a https://www.midsussex.gov.uk/media/3159/ep23a_strategicsitepaper_sep17.pdf). This approach was supported by the District Plan Inspector who commented that this approach was sound. The assessment criteria and methodology used for the District Plan has been developed to reflect the fact that the Site Allocations DPD assessment is looking at a range of size of sites and to reflect latest government in the NPPF (2018).

1.16. As part of the plan making process and in accordance with legislation, the Site Allocations DPD will be informed and accompanied by a Sustainability Appraisal. The Sustainability Appraisal will assess all 'reasonable alternatives' (e.g. options for sites) against a range of sustainability criteria (known as the 'Sustainability Framework'). The assessment within this paper does not intend to replace the Sustainability Appraisal, which will be prepared separately. The Site Selection Paper(s) will help refine the list of 'reasonable alternatives' to be assessed within the Sustainability Appraisal. Both documents will be used in combination to assist with the determination of the most suitable and sustainable sites for allocation in the DPD. This is a robust approach which was used during the preparation and examination of the District Plan.

2. Site Selection Methodology – Housing Sites

Introduction

- 2.1. The methodology has been developed to provide a clear framework to assess each housing site on a consistent basis to develop a shortlist of the most suitable and sustainable sites for inclusion in the Site Allocations DPD.
- 2.2. There are 17 criteria which each housing site will be assessed against, split into three parts. The impact on each criterion is graded using a 'traffic light' system dependent upon its potential impact:

	Very Positive Impact
	Positive Impact
	Neutral Impact
	Negative Impact
	Very Negative Impact

- 2.3. For some criteria, there is more than one way of achieving a 'very positive impact' or 'very negative impact'. Similarly, some criteria may not achieve any negative impacts as all possible outcomes are positive. The 'very negative' impacts are usually reserved for criteria that are highlighted within the National Planning Policy Framework (NPPF) as a significant constraint to development, or those which would "significantly and demonstrably" outweigh any benefits.

Criteria Selection and Weighting

- 2.4. The 17 criteria have been split into three sections; Part 1: Constraints, Part 2: Deliverability considerations and Part 3: Sustainability/Access to Services.
- 2.5. Once all the sites have been assessed they will be ranked against other sites in the same settlement, according to how they perform against the Site Selection criteria. This ranking will not be a simple totalling of the number of 'Very Positive' -> 'Very Negative' impacts because some criteria carry more weight than others. For example, a 'red' – high impact for a site in the AONB (under criteria 1), will carry more weight than 'red' low impact for landscape capacity (under criteria 8).
- 2.6. The NPPF is clear that development in the most environmentally sensitive locations should be avoided. The constraints section of the criteria have been developed to reflect this, and the Council will place the greatest weight on these criteria in the selection process. It is the intention that sites scoring as 'very negative' (red) on any of

the criteria in this section will be removed from the palette of sites at this stage, as these have the greatest negative impact, and more suitable sites are available.

- 2.7. The second section of the assessment looks at the deliverability considerations. This will take into account factors such as impact on the strategic highway network, deliverability and infrastructure delivery.
- 2.8. The third section of the assessment will look at the proximity of sites in relation to services.
- 2.9. The site selection process will be an iterative process. The District Plan strategy, set out in DP4: Housing and DP6: Settlement Hierarchy clearly sets out how development should be distributed between the settlements. The starting point for the preparation of the DPD is to achieve this distribution. However, ahead of undertaking the site selection process it is not known to what extent this strategy can be delivered using suitable and sustainable sites. This means that following the assessment there will be a need to revisit DP4: Housing and DP6: Settlement Hierarchy to ensure the sites selected meet with District Plan Strategy as far as possible.
- 2.10. In the event that one settlement category cannot meet its requirement, any shortfall will need to be met in the next settlement category in the hierarchy. For example, if there are not sufficient suitable, available and developable sites to deliver the 838 dwellings in category 2 (as required by DP4: Housing), the residual amount will then be passed down to the settlements within category 3, and so on. If, having been through the site assessment process, there are still insufficient sites to satisfy the settlement category requirement, it will be necessary to repeat the process. This will involve looking again at sites that had previously been excluded or perform negatively and seeking opportunities to overcome potential constraints and barriers to development, in order to reassess them against the criteria.

3. Site Selection Criteria - Housing Sites

Part 1 – Planning Constraints

1) AONB	
<p><i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” (NPPF 2018, para 172)</i></p>	
<p>Source: High Weald AONB Unit assessment of sites within/proximity of the AONB</p>	
<p>Assessment Notes: Low/Moderate/High impact on the AONB will be determined by the High Weald AONB unit based on their own assessment criteria and knowledge.</p>	
Wholly/most within – High impact	The whole site/ majority is within the AONB, AONB unit conclude high impact
Wholly within – Moderate Impact	The whole site/ majority is within the AONB, AONB unit conclude moderate impact
Wholly within – Low impact	The whole site/ majority is within the AONB, AONB unit conclude low impact
N/A	No Impact – to be assessed under (8) – Landscape Capacity/Suitability

2) Flood Risk	
<p><i>“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” (NPPF 2018, para 155)</i></p>	
<p>Source: Environment Agency Flood Risk Zones, MSDC Strategic Flood Risk Assessment</p>	
<p>Assessment Notes: Where flood risk would make a site undevelopable (due to the location of the area at risk from flooding, or the amount of site at risk from flooding) it will be assessed as ‘Significant’.</p>	
Significant	Site is affected by significant areas of flood risk/historic flood events which would affect the site’s developability
FZ2/3 and Historic	Site has areas within Flood Zone 2/3 or has flooded historically
Partial FZ 2/3	Site has small areas within Flood Zone 2/3, no known historic events
Historic	Site has flooded historically but is not within Flood Zone 2/3
Adjacent FZ 2/3	Site is adjacent to Flood Zone 2/3, potential future flood risk
None	Site is unaffected by flood risk

3) Ancient Woodland	
<p><i>“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.” (NPPF 2018, para 175c)</i></p>	
<p>Source: Mid Sussex Ancient Woodland Inventory (GIS)</p>	
<p>Assessment Notes: Where presence of ancient woodland would make a site undevelopable (due to the location or the amount of ancient woodland that cannot be mitigated) it will be assessed as ‘Significant’.</p>	
Significant	Site is affected by significant amounts of ancient woodland which would affect the site’s developability
Partial	Site is partially covered by areas of ancient woodland, site yield could be achieved but mitigation required
Adjacent	Site is adjacent to an area of ancient woodland
15m Buffer only	Site is within a 15m buffer from an area of ancient woodland
None	No ancient woodland on site or within 15m

4) SSSI/Local Wildlife Sites/Local Nature Reserves

“development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.” (NPPF 2018, para 175b)

Source: Natural England SSSI dataset and Impact Risk Zones, consultation responses from Natural England/Sussex Wildlife Trust.

Assessment Notes: Impact on Sites of Special Scientific Interest (SSSI) will be determined by Natural England (NE) based on their own assessment criteria and knowledge. Impact on locally designated sites (Local Wildlife Sites - LWS/Local Nature Reserves - LNR) will be determined by Sussex Wildlife Trust (SWT).

SSSI Adjacent – NE Objection	Site is adjacent to a Site of Special Scientific Interest (SSSI) – objection from NE
SSSI Adjacent – NE Mitigation	Site is adjacent to a Site of Special Scientific Interest (SSSI) – NE raise or conclude impacts can be mitigated.
Local Wildlife Site – SWT Objection	Site is within/adjacent to a Local Wildlife Site (LWS – Locally designated site) –objection from Sussex Wildlife Trust
Local Wildlife Site – SWT Mitigation	Site lies within/adjacent to a Local Nature Reserve (LNR – Locally designated site) – Sussex Wildlife Trust raise no objection or conclude impacts can be mitigated.
None	Site is not adjacent to a SSSI/Local Wildlife Site/LNR

5) Heritage - Listed Building

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2018, para 193)

Source: Historic England Listed Buildings (GIS), consultation response from MSDC Conservation Officer

Assessment Notes: Comments from MSDC Conservation Officer will determine whether there is predicted to be Substantial Harm/Harm/No Impact re: Listed Buildings. Based on site layout information submitted by site proponent (where provided).

Listed Building - Substantial Harm	Listed buildings are present on site/proximity - substantial harmful impact on Listed Building
Listed Building – Less than substantial Harm – High	Listed buildings are present on site/proximity - Less than substantial Harm – High
Listed Building – Less than substantial Harm – Medium	Listed Buildings are present on site/proximity - Less than substantial Harm – Medium
Listed Building – Less than substantial Harm – Low	Listed buildings are present on site/proximity - Less than substantial Harm – Low
None	There are no listed buildings on/near the site/ likely no harm

6) Heritage - Conservation Area

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2018, para 193)

Source: Consultation response from MSDC Conservation Officer

Assessment Notes: Comments from MSDC Conservation Officer will determine whether there is predicted to be Harm/No Impact based on site layout information submitted by site proponent (where provided)

Impact on CA – objection	Site is within/outside conservation area – Substantial harmful impact on CA
Impact on CA – Less than substantial harm - High	Site is within/outside conservation area - Less than substantial harm - high
Impact on CA – Less than substantial harm - Medium	Site is within/outside conservation area – Less than substantial harm – medium
Impact on CA – less than substantial harm - Low	Site is within/outside conservation area - Less than substantial harm - low
None	There are no conservation areas near the site/likely no harm

7) Archaeology

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2018, para 193)

Source: West Sussex County Council Archaeological Notification Areas (GIS), consultation response from WSCC County Archaeologist.

Assessment Notes: Impact on archaeological assets will be determined by the WSCC County Archaeologist based on their own assessment criteria and knowledge.

Severe	Severe impact on archaeological asset, objection from archaeological adviser
Moderate - Mitigation	Moderate impact on archaeological asset, archaeological adviser concludes impact can be mitigated.
None	No impact on archaeological asset, no objection from archaeological adviser

8) Landscape Capacity/Suitability (for sites not in AONB)

“Planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils... recognising the intrinsic character and beauty of the countryside” (NPPF 2018, para 170)

Source: Capacity of Mid Sussex District to accommodate development (LUC, 2014), SHLAA: Review of Landscape and Visual Aspects of Site Suitability (LUC, 2015), Landscape Capacity Update (TBC), High Weald AONB Unit Assessments, South Downs National Park Authority Assessments

Assessment Notes: Conclusions are drawn for each site dependent on which Landscape Capacity area they are within (as determined by the landscape capacity studies, based on their assessment methodology) or comments received from specialist advisors.

Low	Based on landscape evidence, low potential in landscape terms
Low/Medium	Based on landscape evidence, low/medium potential in landscape terms
Medium	Based on landscape evidence, medium potential in landscape terms
Medium/High	Based on landscape evidence, medium/high potential in landscape terms
High	Based on landscape evidence, high potential in landscape terms / site is within Built-up Area

9) Trees/ Tree Preservation Orders

“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists” (NPPF 2018, para 175c)

“Planning Policies and decision should contribute to and enhance the natural and local environment by....recognising the intrinsic character and beauty of the countryside – including...trees and woodland.” (NPPF 2018, para 170b)

Source: Tree Preservation Orders (GIS), consultation response from MSDC Tree Officer

Assessment Notes: Impact on trees will be determined by the MSDC Tree Officer based on their own assessment criteria and knowledge.

Significant tree cover – high impact	A significant part of the site covered by trees, objection raised by Tree Officer
Low/Medium	Parts of sites affected by trees, will limit the developable area of the site, Tree Officer concludes that impact can be mitigated.
None	Site not affected by trees

Part 2 –Developability considerations

10) Highways/Strategic Road Network

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” (NPPF 2018, para 103)

Source: Mid Sussex Transport Study (SYSTRA)

Assessment Notes: The Mid Sussex Transport Study will identify locations with transport constraints, officer assessment will be made (based on available evidence) as to whether it is likely the development could mitigate any impacts the development is likely to have. Note: an assessment of in-combination effects (i.e. likely combined impact from multiple sites) will be undertaken to inform proposed development scenarios later in the Site Allocations DPD process.

Severe	Severe transport constraints, caused by the development, unlikely to be mitigated by development
Significant - Uncertain	Significant transport constraints, caused by the development, uncertain if they can be mitigated
Significant - Improve	Significant transport constraints, caused by the development, could be improved/mitigated by development
Moderate - Improve	Moderate transport constraints, caused by the development, could be improved/mitigated by development
Minor - Improve	Minor transport constraints, caused by the development, likely to be improved/mitigated by development
None	No known transport constraints caused by the development

11) Local Road Network/Access to site

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” (NPPF 2018, para 109) In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that... safe and suitable access to the site can be achieved for all users.” (NPPF 2018, para 108c)

Source: SYSTRA Site Access Report (2018)

Assessment Notes: Officer assessment of whether there is likely to be an impact on the local highway network (based on the findings of the Mid Sussex Transport Study). Officer assessment to determine whether there is likely to be suitable access – any with uncertain access arrangements will be assessed within the SYSTRA Site Access Report and conclusions used to determine the impact for this criterion.

Severe	Severe impact on local highway network, caused by development/ access to site cannot be achieved, unlikely to be mitigated by development
Significant - Uncertain	Significant impact on local highway network caused by development / access to site can be achieved, uncertain if they can be mitigated
Significant - Improve	Significant impact on local highway network caused by development / access to site can be achieved, could be improved/mitigated by development
Moderate - Improve	Moderate impact on local highway network caused by development / access to site can be achieved, could be improved/mitigated by development
Minor - Improve	Minor impact on local highway network transport constraints caused by development, likely to be improved/mitigated by development
None	No known transport constraints caused by development / access to site can be achieved.

12) Developability

“To be considered deliverable, sites need for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years” (NPPF 2018, Annex 2)

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged” (NPPF, 2018, Annex 2)

Source: SHELAA Site Submissions, Site Promoter Developability Questionnaire

Assessment Notes: Site proponent submissions, including responses to the Site Promoter Developability Questionnaire will inform the assessment. The Site Allocation DPD will cover a 13 year timeframe. The document will allocate some sites that are capable of delivery in the first 5 years of the Plan and others will come forward later in the Plan period. Therefore, the assessment is considering both deliverable and developable sites.

Uncertain if the site is developable	Whilst the site has been promoted for development through the call for sites, there has been no further evidence submitted to demonstrate that the site is developable within the Plan period.
Reasonable prospect	Whilst it has not been demonstrated that the site is deliverable within five years, there is a reasonable prospect that it will be developable within the Plan period
Developable	It has been demonstrated that the site is deliverable, within the Plan period

13) Infrastructure

“Achieving sustainable development means...

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure” (NPPF 2018, para 8a)

Source: SHELAA Site Submissions, Site Promoter Deliverability Questionnaire

Assessment Notes: Site proponent submissions, including responses to the Site Promoter Deliverability Questionnaire will inform the assessment.

Infrastructure deficit	Significant deficits in on-site/off-site infrastructure exist which are unlikely to be viably improved or replaced, despite contributions from this and other development
Potential to improve Infrastructure	Improvements to on-site/off-site infrastructure (physical, community, green infrastructure) required but can be provided either in whole or part funding from the development
Infrastructure capacity	No improvements to on-site/off-site infrastructure (physical, community, green infrastructure) required.

Part 3 – Sustainability/ Access to services

14) Education – Distance to Primary Schools

“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should... give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications” (NPPF 2018, para 94)

“Planning policies should... support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities” (NPPF 2018, para 104a)

Source: MSDC Sustainability Mapping (GIS)

Assessment Notes: Measured using the most practical walking route from the centre of the site to nearest Primary School. Based on MSDC Sustainability standards (see Mid Sussex Capacity Study and District Plan Sustainability Appraisal):

- 20 minute walk: 1.6km
- 15 minute walk: 1.2km
- 10 minute walk: 800m

>20 Minute Walk	Site is greater than a 20 minute walk from the nearest primary school
15-20 Minute Walk	Site is between 15-20 minute walk from the nearest primary school
10-15 Minute Walk	Site is between 10-15 minute walk from the nearest primary school
<10 Minute Walk	Site is less than a 10 minute walk from the nearest primary school
Onsite	Likely that a new school would be provided onsite as part of this development

15) Health – Distance to GP Surgery

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for...community facilities (such as health...)” (NPPF 2018, para 20c)

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles, especially where this would address identified local health and well-being needs” (NPPF 2018, para 91c)

Source: MSDC Sustainability Mapping (GIS)

Assessment Notes: Measured using the most practical walking route from the centre of the site to nearest GP surgery. Based on MSDC Sustainability standards (see Mid Sussex Capacity Study and District Plan Sustainability Appraisal):

- 20 minute walk: 1.6km
- 15 minute walk: 1.2km
- 10 minute walk: 800m

>20 Minute Walk	Site is greater than a 20 minute walk from the nearest GP surgery
15-20 Minute Walk	Site is between 15-20 minute walk from the nearest GP surgery
10-15 Minute Walk	Site is between 10-15 minute walk from the nearest GP surgery
<10 Minute Walk	Site is less than a 10 minute walk from the nearest GP surgery
Onsite	Likely that a new GP surgery would be provided onsite as part of this development

16) Services – Distance to Town/Village Centre

“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.” (NPPF 2018, para 85)

“Planning policies should...support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities” (NPPF 2018, para 104a)

Source: MSDC Sustainability Mapping (GIS)

Assessment Notes: Measured using the most practical walking route from the centre of the site to nearest Town/Village centre. Based on MSDC Sustainability standards (see Mid Sussex Capacity Study and District Plan Sustainability Appraisal):

- 20 minute walk: 1.6km
- 15 minute walk: 1.2km
- 10 minute walk: 800m

>20 Minute Walk	Site is greater than a 20 minute walk from the nearest town/village centre
15-20 Minute Walk	Site is between 15-20 minute walk from the nearest town/village centre
10-15 Minute Walk	Site is between 10-15 minute walk from the nearest town/village centre
<10 Minute Walk	Site is less than a 10 minute walk from the nearest town/village centre

17) Public Transport

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued” (NPPF 2018, para 102c)

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” (NPPF 2018, para 103)

Source: MSDC Sustainability Mapping (GIS)

Assessment Notes: Measured using the most practical walking route from the centre of the site to nearest Public Transport. Based on MSDC Sustainability standards (see Mid Sussex Capacity Study and District Plan Sustainability Appraisal).

Bus Service		Distance			
		400m	600m	800m	800+m
Frequency	Excellent (4+/hour)	Excellent	Good	Good	Fair
	Good (2+/hour)	Good	Good	Fair	Fair
	Fair (<2/hour)	Good	Fair	Fair	Poor
	Poor (Infrequent)	Fair	Fair	Poor	Poor

Train Service	Distance			
	<800m	<1.2km	<1.6km	>1.6km
	Excellent	Good	Fair	Poor

Overall Assessment		Train Service			
		Excellent	Good	Fair	Poor
Bus Service	Excellent	Excellent	Good	Good	Fair
	Good	Good	Good	Fair	Fair
	Fair	Good	Fair	Fair	Poor
	Poor	Fair	Fair	Poor	Poor

Poor	Access to public transport and/or frequency of public transport in this location is poor
Fair	Access to public transport and/or frequency of public transport in this location is fair
Good	Access to public transport and/or frequency of public transport in this location is good
Excellent	Access to public transport and/or frequency of public transport in this location is excellent

4. Site Selection Methodology – Employment Sites

Introduction

- 4.1. The methodology has been developed to provide a clear framework to assess each employment site against criteria to develop a shortlist of the most suitable and sustainable sites for inclusion in the Site Allocations DPD.
- 4.2. There are 19 criteria split into 3 parts which each employment site will be assessed against. The impact on each criterion is graded using a ‘traffic light’ system dependent upon its potential impact:

	Very Positive Impact
	Positive Impact
	Neutral Impact
	Negative Impact
	Very Negative Impact

- 4.3. For some criteria, there is more than one way of achieving a ‘very positive impact’ or ‘very negative impact’. Similarly, some criteria may not achieve any negative impacts as all possible outcomes are positive. The ‘very negative’ impacts are usually reserved for criteria that are highlighted within the National Planning Policy Framework (NPPF) as a significant constraint to development, or those which would “significantly and demonstrably” outweigh any benefits.

Criteria Selection and Weighting

- 4.4. The 19 criteria have been split into three parts; Part 1: Constraints, Part 2: Deliverability considerations and Part 3: Market Forces.
- 4.5. The criteria used for housing sites in Site Selection Papers 1 and 2 reflect the District Plan strategy, which does not support sites that are unconnected to existing settlements. Unlike housing, the NPPF is supportive of employment sites in rural areas and recognises the fact that sites “may have to be found adjacent to or beyond existing settlements (para 84). Therefore, the assessment process for employment sites differs in terms of the criteria chosen and the weight that may be applied to the criteria (with less emphasis on isolation from settlements compared to the housing site selection methodology).
- 4.6. The constraints section mirrors the criteria used to assess housing sites. Again, the Council places the greatest weight on these criteria in the selection process, and those sites assessed as having ‘very negative’ impact on any of these criteria should be removed from the palette of sites.
- 4.7. The second part of the assessment considers deliverability. Of particular note is the criterion related to accessibility to ‘A’ roads and motorways, given the requirement for many businesses to be on strategic routes. Availability and achievability are also important considerations given the more fluid market demand for employment compared to housing, also bearing in mind the NPPF policy (para 120) on re-allocating land for more deliverable uses should the existing allocation not be brought forward. This is why there are two objectives related to deliverability compared to the housing criteria.

- 4.8. The third part relates to market forces and jobs/market demand. These criteria reflect the requirements of the NPPF, that “planning policies and decisions should recognise and address the specific locational requirements of different sectors” (para 82) and that provision should be made in suitably accessible locations.

5. Site Selection Criteria - Employment

Part 1 - Planning Constraints

1) AONB	
<i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” (NPPF 2018, para 172)</i>	
Source: High Weald AONB Unit assessment of sites within/proximity of the AONB	
Assessment Notes: Low/Moderate/High impact on the AONB will be determined by the High Weald AONB unit based on their own assessment criteria and knowledge.	
Wholly/most within – High impact	The whole site/ majority is within the AONB, AONB unit conclude high impact
Wholly within – Moderate Impact	The whole site/ majority is within the AONB, AONB unit conclude moderate impact
Wholly within – Low impact	The whole site/ majority is within the AONB, AONB unit conclude low impact
N/A	No Impact – to be assessed under (8) – Landscape Capacity/Suitability

2) Flood Risk	
<i>“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” (NPPF 2018, para 155)</i>	
Source: Environment Agency Flood Risk Zones, MSDC Strategic Flood Risk Assessment	
Assessment Notes: Where flood risk would make a site undevelopable (due to the location of the area at risk from flooding, or the amount of site at risk from flooding) it will be assessed as ‘Significant’.	
Significant	Site is affected by significant areas of flood risk / historic flood events which would affect the site’s developability
FZ2/3 and Historic	Site has areas within Flood Zone 2/3 or has flooded historically
Partial FZ 2/3	Site has small areas within Flood Zone 2/3, no known historic events
Historic	Site has flooded historically but is not within Flood Zone 2/3
Adjacent FZ 2/3	Site is adjacent to Flood Zone 2/3, potential future flood risk
None	Site is unaffected by flood risk

3) Ancient Woodland	
<i>“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.” (NPPF 2018, para 175c)</i>	
Source: Mid Sussex Ancient Woodland Inventory (GIS)	
Assessment Notes: Where ancient woodland would make a site undevelopable (due to the location or the amount of ancient woodland that cannot be mitigated) it will be assessed as ‘Significant’.	
Significant	Site is affected by significant amounts of ancient woodland which would affect the site’s developability
Partial	Site is partially covered by areas of ancient woodland, site yield could be achieved but mitigation required
Adjacent	Site is adjacent to an area of ancient woodland
15m Buffer only	Site is within a 15m buffer from an area of ancient woodland
None	No ancient woodland on site or within 15m

4) SSSI/Local Wildlife Sites/Local Nature Reserves	
<i>“development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.” (NPPF 2018, para 175b)</i>	
Source: Natural England SSSI dataset and Impact Risk Zones, consultation responses from Natural England/Sussex Wildlife Trust.	
Assessment Notes: Impact on Sites of Special Scientific Interest (SSSI) will be determined by Natural England (NE) based on their own assessment criteria and knowledge. Impact on locally designated sites (Local Wildlife Sites - LWS/Local Nature Reserves - LNR) will be determined by Sussex Wildlife Trust (SWT).	
SSSI Adjacent – NE Objection	Site is adjacent to a Site of Special Scientific Interest (SSSI) – objection from NE
SSSI Adjacent – NE Mitigation	Site is adjacent to a Site of Special Scientific Interest (SSSI) – NE raise or conclude impacts can be mitigated.
Local Wildlife Site Adjacent – SWT Objection	Site is adjacent to a Local Wildlife Site (LWS – Locally designated site) –objection from Sussex Wildlife Trust
Local Wildlife Site Adjacent – SWT Mitigation	Site lies adjacent to a Local Nature Reserve (LNR – Locally designated site) – Sussex Wildlife Trust raise no objection or conclude impacts can be mitigated.
None	Site is not adjacent to a SSSI/Local Wildlife Site/LNR

5) Heritage - Listed Building	
<i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2018, para 193)</i>	
Source: Historic England Listed Buildings (GIS), consultation response from MSDC Conservation Officer	
Assessment Notes: Comments from MSDC Conservation Officer will determine whether there is predicted to be Substantial Harm/Harm/No Impact based on site layout information submitted by site proponent (where provided).	
Listed Building - Substantial Harm	Listed buildings are present on site/proximity - substantial harmful impact on Listed Building
Listed Building – Less than substantial Harm – High	Listed buildings are present on site/proximity - Less than substantial Harm – High
Listed Building – Less than substantial Harm – Medium	Listed Buildings are present on site/proximity - Less than substantial Harm – Medium
Listed Building – Less than substantial Harm – Low	Listed buildings are present on site/proximity - Less than substantial Harm – Low
None	There are no listed buildings on/near the site/ likely no harm

6) Heritage Conservation Area	
<i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2018, para 193)</i>	
Source: Consultation response from MSDC Conservation Officer	
Assessment Notes: Comments from MSDC Conservation Officer will determine whether there is predicted to be Harm/No Impact based on site layout information submitted by site proponent (where provided).	
Impact on CA – objection	Site is within/outside conservation area – Substantial harmful impact on CA
Impact on CA – Less than substantial harm - High	Site is within/outside conservation area - Less than substantial harm - high
Impact on CA – Less than substantial harm - Medium	Site is within/outside conservation area – Less than substantial harm – medium
Impact on CA – less than substantial harm - Low	Site is within/outside conservation area - Less than substantial harm - low
None	There are no conservation areas near the site/likely no harm

7) Archaeology	
<p><i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”</i> (NPPF 2018, para 193)</p>	
<p>Source: West Sussex County Council Archaeological Notification Areas (GIS), consultation response from WSCC County Archaeologist.</p>	
<p>Assessment Notes: Impact on archaeological assets will be determined by the WSCC County Archaeologist based on their own assessment criteria and knowledge.</p>	
Severe	Severe impact on archaeological asset, objection from archaeological adviser
Moderate - Mitigation	Moderate impact on archaeological asset, archaeological adviser concludes impact can be mitigated.
None	No impact on archaeological asset, no objection from archaeological adviser

8) Landscape Capacity/Suitability (for sites not in AONB)	
<p><i>“Planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils... recognising the intrinsic character and beauty of the countryside”</i> (NPPF 2018, para 170)</p> <p><i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings”</i> (NPPF, para 84)</p>	
<p>Source: Capacity of Mid Sussex District to accommodate development (LUC, 2014), SHLAA: Review of Landscape and Visual Aspects of Site Suitability (LUC, 2015), Landscape Capacity Update (TBC), High Weald AONB Unit Assessments, South Downs National Park Authority Assessments</p>	
<p>Assessment Notes: Conclusions are drawn for each site dependent on which Landscape Capacity area they are within (as determined by the landscape capacity studies, based on their assessment methodology) or comments received from specialist advisors.</p>	
Low	Based on landscape evidence, low potential in landscape terms
Low/Medium	Based on landscape evidence, low/medium potential in landscape terms
Medium	Based on landscape evidence, medium potential in landscape terms
Medium/High	Based on landscape evidence, medium/high potential in landscape terms
High	Based on landscape evidence, high potential in landscape terms / site is within Built-up Area

9) Trees/ Tree Preservation Orders (for sites not affected by Ancient Woodland)	
<p><i>“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”</i> (NPPF 2018, para 175c)</p> <p><i>“Planning Policies and decisions should contribute to and enhance the natural and local environment by...recognising the intrinsic character and beauty of the countryside – including...trees and woodland.”</i> (NPPF 2018, para 170)</p>	
<p>Source: Tree Preservation Orders (GIS), consultation response from MSDC Tree Officer</p>	
<p>Assessment Notes: Impact on trees will be determined by the MSDC Tree Officer based on their own assessment criteria and knowledge.</p>	
Significant tree cover – high impact	A significant part of the site covered by trees, objection raised by Tree Officer
Low/Medium	Parts of sites effected by trees, will limit the developable area of the site, Tree Officer concludes that impact can be mitigated.
None	Site not effected by trees

Part 2 - Accessibility

10) Highways/Strategic Road Network/Access	
<p><i>“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” (NPPF 2018, para 103)</i></p>	
<p>Source: Mid Sussex Transport Study (SYSTRA)</p>	
<p>Assessment Notes: The Mid Sussex Transport Study will identify locations with transport constraints, officer assessment will be made (based on available evidence) as to whether it is likely the development could mitigate any impacts the development is likely to have. Note: an assessment of in-combination effects (i.e. likely combined impact from multiple sites) will be undertaken to inform proposed development scenarios later in the Site Allocations DPD process.</p>	
Severe	Severe transport constraints, caused by the development, unlikely to be mitigated by development
Significant – Uncertain	Significant transport constraints, caused by the development, uncertain if they can be mitigated
Significant - Improve	Significant transport constraints, caused by the development, could be improved/mitigated by development
Moderate - Improve	Moderate transport constraints, caused by the development, could be improved/mitigated by development
Minor - Improve	Minor transport constraints, caused by the development, likely to be improved/mitigated by development
None	No known transport constraints caused by the development.

11) Strategic Road Access – Accessibility to ‘A’ Roads and Motorway	
<p><i>“Planning policies and decisions should recognise and address the specific locational requirements of different sectors” (NPPF 2018, para 82)</i></p>	
<p>Source: MSDC Sustainability Mapping (GIS)</p>	
<p>Assessment Notes: Measured using the most practical driving route from the centre of the site to nearest Motorway/A-Road Junction. Standards based on those used in Chilmark SELAA 2016.</p>	
Very Poor Access	Motorway and A-Road junction access both in excess of 5 miles
Poor Access	Motorway and/or A-Road junction access in excess of 5 miles
Moderate Access	Motorway and/or A-Road junction access between 3-5 miles
Good Access	Motorway and/or A-Road junction access in under 3 miles
Excellent Access	Motorway and A-Road junction access both under 3 miles

12) Infrastructure	
<p><i>“Achieving sustainable development means... a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure” (NPPF 2018, para 8a)</i></p>	
<p>Source: SHELAA Site Submissions, Site Promoter Deliverability Questionnaire</p>	
<p>Assessment Notes: Site proponent submissions, including responses to the Site Promoter Deliverability Questionnaire will inform the assessment.</p>	
Infrastructure deficit	Significant deficits in on-site/off-site infrastructure exist which are unlikely to be viably improved or replaced, despite contributions from this and other development
Potential to improve Infrastructure	Improvements to on-site/off-site infrastructure (physical, community, green infrastructure) required but can be provided either in whole or part funding from the development
Infrastructure capacity	No improvements to on-site/off-site infrastructure (physical, community, green infrastructure) required.

13) Availability	
<p><i>“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.” (NPPF 2018, para 120)</i></p>	

Source: SHELAA Site Submissions, Site Promoter Deliverability Questionnaire	
Assessment Notes: Site proponent submissions, including responses to the Site Promoter Deliverability Questionnaire will inform the assessment.	
Not Promoted	Site has not been promoted / no confirmation of availability from landowner/developer
Promoted – Other Use	Site has been promoted for B-Class or Housing (conflict)
Promoted	Site has been promoted for B-Class use by landowner/developer

14) Achievability	
<i>“Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan... they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs” (NPPF 2018, para 120)</i>	
Source: SHELAA Site Submissions, Site Promoter Deliverability Questionnaire	
Assessment Notes: Site proponent submissions, including responses to the Site Promoter Deliverability Questionnaire will inform the assessment. Delivery refers to completion of the site in its entirety, for larger strategic sites it refers to delivery of at least the first phase (acknowledging that sites of this size will have longer build-out rates).	
Long Term	Delivery is only likely long-term (risk to allocation/potential alternative use) (11+ years)
Medium Term	Reasonable prospect of medium-term delivery (6-10 years)
Short Term	Reasonable prospect of short-term delivery (1-5 years)

Part 3 - Market Forces: Jobs/Market Demand

15) Public and Sustainable Transport

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued” (NPPF 2018, para 102c)

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” (NPPF 2018, para 103)

Source: MSDC Sustainability Mapping (GIS)

Assessment Notes: Access by public transport measured using the most practical walking route from the centre of the site to nearest Public Transport. Based on MSDC Sustainability standards (see Mid Sussex Capacity Study and District Plan Sustainability Appraisal). Officer based assessment as to whether the site could be viably reached by existing/planned sustainable transport modes.

Bus Service		Distance			
		400m	600m	800m	800+m
Frequency	Excellent (4+/hour)	<i>Excellent</i>	<i>Good</i>	<i>Good</i>	<i>Fair</i>
	Good (2+/hour)	<i>Good</i>	<i>Good</i>	<i>Fair</i>	<i>Fair</i>
	Fair (<2/hour)	<i>Good</i>	<i>Fair</i>	<i>Fair</i>	<i>Poor</i>
	Poor (Infrequent)	<i>Fair</i>	<i>Fair</i>	<i>Poor</i>	<i>Poor</i>

Train Service		Distance			
		<800m	<1.2km	<1.6km	>1.6km
		<i>Excellent</i>	<i>Good</i>	<i>Fair</i>	<i>Poor</i>

Overall Assessment		Train Service			
		Excellent	Good	Fair	Poor
Bus Service	Excellent	<i>Excellent</i>	<i>Good</i>	<i>Good</i>	<i>Fair</i>
	Good	<i>Good</i>	<i>Good</i>	<i>Fair</i>	<i>Fair</i>
	Fair	<i>Good</i>	<i>Fair</i>	<i>Fair</i>	<i>Poor</i>
	Poor	<i>Fair</i>	<i>Fair</i>	<i>Poor</i>	<i>Poor</i>

Poor	Access/frequency of public transport and/or sustainable transport modes in this location is poor
Fair	Access/frequency of public transport and/or sustainable transport modes in this location is fair
Good	Access/frequency of public transport and/or sustainable transport modes in this location is good
Excellent	Access/frequency of public transport and/or sustainable transport modes in this location is excellent

16) Compatibility of Adjoining Uses

“Economic Objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places” (NPPF, para 8)

Source: MSDC Mapping (GIS), Site Visit, Desktop Assessment

Assessment Notes: Officer judgement based on proposed use for the site and the existing types of uses on sites in the surrounding area. Includes compatibility with other employment generating development.

Incompatible	Development of proposed employment use(s) would not be compatible with the types of activity and uses taking place on adjoining land.
Compatible - Mitigation	Development of proposed employment use(s) may be compatible with the types of activity and uses taking place on adjoining land.
Compatible	Development of proposed employment use(s) would be compatible with types of activity and uses taking place on adjoining land.

17) Proximity to Labour Force

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors.” (NPPF, para 82)

Source: Employment Need Review, Census 2011, Origin – Destination statistics

Assessment Notes: *[thresholds for Very Poor -> Very Good can be defined upon publication of the Employment Need Review paper – Nov/Dec 2018]*

Labour Force– Very Poor	Census/survey data suggests there is a very poor supply of labour in this location
Labour Force - Poor	Census/survey data suggests there is a poor supply of labour in this location
Labour Force - Moderate	Census/survey data suggests there is a moderate supply of labour in this location
Labour Force - Good	Census/survey data suggests there is a good supply of labour in this location
Labour Force – Very Good	Census/survey data suggests there is a very good supply of labour in this location

18) Market Attractiveness

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.” (NPPF, para 80)

Source: Employment Need Review, Market survey

Assessment Notes: *[thresholds for Very Poor -> Very Strong can be defined upon publication of the Employment Need Review paper – Nov/Dec 2018]*

Very Poor	There is a very poor market for additional B-Class use in this location
Poor	There is a poor market for additional B-Class use in this location
Moderate	There is a moderate market for additional B-Class use in this location
Strong	There is a strong market for additional B-Class use in this location
Very Strong	There is a very strong market for additional B-Class use in this location

19) Visibility and Prominence

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” (NPPF, para 82)

Source: Officer assessment, Employment Need Review

Assessment Notes: Officer assessment based on previous assessment criteria used in Chilmark SELAA 2016.

Low	No or highly limited market visibility or prominence of the site’s location
Medium	Limited market visibility or prominence
High	High market visibility and prominent site location

6. Assessment Conclusions

- 6.1. Once all sites have been assessed, the total of very positive to very negative impacts will be recorded and weight applied accordingly to determine the most suitable sites for allocation on a settlement-by-settlement basis.
- 6.2. The Site Allocations DPD intends to allocate sufficient sites according to the strategy established within the District Plan (DP4). The aim of the exercise is to determine the most suitable/sustainable sites to meet the District Plan strategy, whilst assisting in the determination of whether a settlement can reasonably meet its indicative housing requirement set out in the supporting text to policy DP6.
- 6.3. The site assessment conclusions will be compared against each other on a settlement-by-settlement basis. This will allow the most suitable sites to be chosen in each individual settlement. If all sites across the district are compared against one another, it may lead to an unequal distribution of sites to be chosen for allocation.
- 6.4. This may result in some sites being chosen for allocation which have higher negative impact across the objectives because this will be on the basis that the aim is to distribute allocations according to the District Plan strategy in the first instance.
- 6.5. In the event that sites within the same settlement have the same assessment outcome, the following hierarchy will be used in order to distinguish between sites:
 - more weight will be given to the outcomes assessed in the 'Constraints' section to identify if one particular constraint/constraints scored more negatively for one site compared to the other,
 - if this still doesn't separate two sites then the deliverability and infrastructure criteria will be used when making final selections.
- 6.6. The assessment will provide consideration of sites against 'Made' Neighbourhood Plans, if applicable. There is not a specific criteria for this within the assessment criteria due the differences in content of the various Neighbourhood Plans, and the need to be consistent when assessing sites. The assessment will take into account any land use designations in the Neighbourhood Plans on the site and consideration will be given to how this designation may impact on the delivery of the site for housing or employment uses. However, it is important to note that the objective of the Site Allocations DPD is to deliver the housing and employment requirements of the District Plan and this may result in conflict with policies in Neighbourhood Plans. Any such conflict would be discussed with the relevant Parish Council.
- 6.7. The District Plan provides the strategy and policy framework for the District for the period 2014 - 2031. The NPPF confirms (paragraph 30) that, once a Neighbourhood Plan has been brought into force, the policies it contains take precedence unless superseded by strategic and non-strategic policies that are adopted subsequently. Therefore, the strategy and strategic policies within the District Plan take precedence over Neighbourhood Plans that were made prior to its adoption (March 2018), and site assessments will account for this.

7. Next Steps

- 7.1. Over the next couple of months officers will undertake the site assessments, according to the methodology. Once this work is complete officers will develop a shortlist of suitable sites that can deliver the District Plan Strategy.
- 7.2. Officers will seek further information from developers/land promoters if further information is required.
- 7.3. Officers will also discuss the emerging work with Town and Parish Councils as appropriate.
- 7.4. Further assessment work will be undertaken prior to publication of the Site Allocations DPD for consultation, in accordance with the relevant regulations. Such work includes Sustainability Appraisal (including Strategic Environmental Assessment) and Habitats Regulations Assessment (HRA). An Air Quality assessment and the Mid Sussex Transport Study will model the combination of sites chosen to represent (as far as possible) the District Plan strategy set out in policies DP4 and DP6.
- 7.5. The consultation on the Regulation 18 Site Allocations DPD, scheduled for Summer 2019, will provide a further opportunity for comment on the site assessments and the application of the District Plan strategy.

Appendix 1: Site Selection Process - Housing

Step	Action
1	Undertake site assessments against part 1/2/3 Criteria, based on information submitted by site promoters and consultants responses.
2	Remove sites that score “Very Negative” on any Part 1 criteria – classify as ‘Not Considered Suitable for Allocation’ for the Site Allocations DPD.
3	Rank sites on a settlement basis according to their Very Positive -> Very Negative impact, applying necessary weight according to the methodology
4	Collate a shortlist sites that scored most positively against each of the criteria for each settlement based on their ranking
5	Assess whether the District Plan strategy (DP4/DP6) can be met (not exceeded) by this shortlist, for each category/settlement IF YES go to step (10) IF NO go to step (too few or too many) (6)
6	<ul style="list-style-type: none"> If the total palette of suitable sites in the settlement is too high, refine by applying the most weight to constraints criteria, then developability and Infrastructure to determine the most suitable sites in the settlement. If the total palette of suitable sites is too low, seek further information on potential mitigation and re-assess.
7	Re-rank the sites based on the further re-assessment undertaken at Step 6
8	Assess whether the District Plan strategy (DP4/DP6) can be met for each category/settlement IF YES go to step (10) IF NO go to step (9)
9	<ul style="list-style-type: none"> Allocate as many suitable site(s) within the settlement based on previous steps and re-distribute any shortfall to other settlements according to the settlement hierarchy². For sites considered suitable for allocation – move to Step 10.
10	Consider the site(s) for allocation – site(s) will be subject to in-combination assessments (e.g. Transport, Air Quality, Sustainability Appraisal, Habitats Regulations Assessment, etc)
11	Progress sites(s) to the Regulation 18 consultation stage of the Site Allocations DPD (consultation).

Note: The process above is relevant for sites promoted for Housing. As there are fewer Employment sites, and the District Plan does not set an indicative requirement on a settlement basis, the overall findings from the Site Selection Criteria will be assessed as a whole (i.e. Employment sites are likely to progress Step 1 -> 2 -> 11).

² It may be necessary to repeat the above process if the numbers allocate to each settlement within a category change, if one settlement cannot meet the District Plan Strategy.