



# **MS-12:**

## **Post Hearings - Site Selection Methodology Review**

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**March 2026**



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# 1. Introduction

1. The initial tranche of examination hearings on the submitted District Plan took place in February and March 2026. Having heard and considered the evidence presented on the housing requirement, the Inspector concluded that the Council needed to ‘test’ a higher housing requirement than that set out in the submitted Plan and updated in **MS-TP2:Housing**. A ‘target’ of 1,200 to 1,300 homes per annum has been set as the range to test. The Inspector has indicated that the Council should seek, so far as possible, to identify sufficient sites to meet a requirement towards the upper end of that range.
2. To determine the extent to which the Council can meet this target figure it will need to explore the potential to allocate additional sites. In this context, and having regard to the preliminary feedback received from the Inspector on the submitted District Plan’s spatial strategy and the soundness of the site selection process used by the Council, this paper sets out the methodology that the Council will apply to re-appraise housing sites in the Strategic Housing Land Availability Assessment (SHELAA) and determine their appropriateness for allocation.
3. For the avoidance of doubt, since the purpose of this exercise is to identify additional sites in order to meet an increased requirement, the Council does not envisage or intend that the process will involve any consideration of removing current allocations from the Plan. However, the Council will consider whether more recent information, or the application of the principles set out below, would support a higher yield from existing allocations which could contribute to meeting the higher requirement.

# 2. Matters arising from Hearing Session

4. During the Matter 5 and 6 hearings, the Inspector noted that the Site Selection Methodology [SP1] was generally sound although there were matters that needed to be addressed through the re-appraisal process. These included:
  - How smaller sites adjacent to the proposed site allocations in the District Plan have been considered and whether there is a need to re-visit those sites discounted at Stage 2(a), for example where, if taken in isolation, the location may not represent sustainable development but where other allocations in the Plan and/or progress on neighbouring authority plans (and in particular any proposed site allocations on the edge of the district boundary) may have a bearing on the sustainability of the location within Mid Sussex.
  - How the site selection methodology relates to the NPPF and the application of ‘showstopper’ constraints (Stage 2(b)). For example, how this relates to the weight given to the protection of National Landscapes.

- The need for a more granular assessment to inform the judgements reached on the performance of sites in respect of specific criteria. This includes, for example, listed buildings, Conservation Areas and the setting of the South Downs National Park.
- The potential for impacts or constraints identified through the site assessment to be capable of mitigation.
- The need for a more positive approach to planning to be integrated into the planning balance where the potential benefits of sites are clearly articulated and weighed.
- The Council should give equal weight to the principles set out in the spatial strategy, rather than applying the cascade approach during plan preparation, where principle 3 (growth at existing sustainable settlements) was favoured over principle 4 (growth at settlements to improve sustainability) subject to the provision of appropriate services and facilities.
- The importance of clearly documenting the process followed by the Council and the rationale for the decisions made. This includes being clear how the Council has weighed the planning balance in relation to NPPF paragraphs 11b)i and 11b)ii.

### 3. Methodology

5. The Council has considered the matters that have been raised and will be undertaking the re-appraisal of sites as follows, having regard to relevant stage of the Site Selection Methodology.

#### *Information Gathering*

6. The Council will:
  - Contact agents/developers who promoted sites in the 2024 SHELAA that are not proposed for allocation in the submitted District Plan. It will request a pro-forma to be completed that provides the latest information on the site including its delivery. The request for information will be sent no later than Monday 9 March, with a deadline of close of play on **20 March 2026** for receipt of any relevant data.
  - Accept any updates from sites proposed for allocation in the Submission Draft District Plan in relation to the potential yields from those sites.
  - Undertake site assessments for any new sites submitted to the Council up until 20<sup>th</sup> March 2026, which were not previously assessed in the 2024 SHELAA [[SSP4](#)].

## *Individual Site Assessments*

### 7. The Council will:

- Review all site assessments, irrespective of the stage at which they were previously rejected, having regard to any newly submitted information from agents/developers, as well as updates from the Council’s evidence base. As explained at the hearing sessions, as part of the review of the site assessment the Council will re-consider the potential for impacts identified to be mitigated. Because the Council does not have the resources to undertake this exercise for each and every site against every criterion, any updated assessment will need to be informed by relevant work undertaken by the agent/developer. This information should be provided as part of the updated information request to be issued by 9 March 2026 (including by reference to information already submitted to the Council that should be relied upon). The Council will then review any information received and use this to inform an updated assessment.
- Re-appraise the sites previously discounted at Stage 2(a) to determine whether other allocations in the Plan or emerging or proposed allocations in the plans of neighbouring authorities materially change the basis on which sites were discounted. Where this is the case, sites will be progressed to Stage 2(b) of the site selection process. The same additional considerations will be applied to any new sites not previously assessed in the 2024 SHELAA.
- Seek views of technical specialists where required to inform the judgement reached by the Council.

### 8. Having regard to the updated site assessments and the feedback received at the hearings, the Council will:

- Assess whether any of the new sites promoted to the Council should be discounted at this stage (as per Stage 2(b) of the methodology).
- Review whether any sites previously rejected at Stage 2(b) should be progressed to the next stage of the process. These are sites where the on-site constraints severely impact the suitability of site for development, previously referred to as ‘showstoppers’ in the Site Selection Methodology. In the light of the Inspector’s comments, the Council agrees that, whilst the NPPF may mean that sites in this category face “strong headwinds”, the question whether there is a “strong reason” to reject them requires consideration of the particularities of the individual site including any benefits that could potentially arise from its development. This will ensure the judgement reached by the Council is demonstrably consistent with paragraph 11b of the NPPF.

### *Overall assessment of sites*

9. In accordance with Stage 2(c) of the Site Selection Methodology, all sites will be re-appraised having regard to the above. This will enable the Council to demonstrate how it has had regard to the requirements of paragraph 11b of the NPPF. These include:
- How the sites individually or collectively contribute to the delivery of the spatial strategy by equal reference to:
    - Principle 3: Growth at existing sustainable settlements where it continues to be sustainable to do so. It is recognised that settlements higher up the settlement hierarchy (e.g. Category 1: Towns and Category 2: Larger Villages) are likely to be more sustainable, but this will not be applied rigidly.
    - Principle 4: Opportunities for extensions, to improve sustainability of existing settlements.
    - How the sites individually or collectively contribute towards the wider ambitions for individual settlements, recognising the need for economic prosperity, thriving centres that deliver a range of services and facilities to meet needs, provision of and support for existing/new services and facilities
10. How, individually or collectively at a settlement level, sites contribute to the delivery of wider or local social and economic benefits or other local priorities including, for example, the protection of valued employment spaces, reflecting the district's distinctive towns and villages, retaining their separate identity and character and preventing coalescence.
- How a site or collection of sites may contribute to meeting unmet needs, taking into account the location of site(s) in relation to where the unmet need arises.
  - How a site or collection of sites relate to centres of employment/planned employment growth and the role it can play in supporting local services, such as schools, local shops as well as promoting sustainable patterns of travel through non-car-based modes. This assessment will balance any negative impacts/harms with benefits in line with NPPF paragraph 11b and therefore contribute to positive planning given the recognition that housing need (in particular, unmet need in neighbouring authority areas) is high. The assessment will seek to demonstrate how this judgement has been arrived at both in relation to the appraisal of the individual site/collection of sites as well as the scale of development that is proposed at individual settlements/areas of the district.
11. The desirability, in terms of delivery, of providing sites with a range of sizes

### *Outputs*

12. The output from the above exercise will be a “long list” of sites that will be subject to further engagement and in-combination testing (in accordance with Stage 3 of the site selection

methodology). This list will be published without prejudice to the final decision by the Council on any further sites that it will ultimately propose for allocation, recognising that this decision can only be arrived at once further in-combination assessment has been undertaken.

13. A granular explanation of why each site is or is not considered suitable for further testing will be documented (e.g. an updated version of Appendix 4 of the Site Selection Conclusions Paper) as well as updated Site Assessment Proforma for each site (as per Appendix 3 of the Site Selection Conclusions Paper).
14. Once this assessment has been completed the Council will issue an updated Appendix 4 Site Selection Paper to site promoters/developers for fact checking (likely for two weeks). The Council will then review any feedback received, document how it has had regard to the feedback (in a similar format to Appendix 2 of the Site Selection Conclusions Paper) and update the site assessment including the Council's preliminary conclusions, as appropriate. This updated "long list" will then be subject to in-combination assessment.

#### *In-Combination testing*

15. In accordance with Stage 3 of the Site Selection Methodology, the in-combination assessment will include:
  - Transport modelling
  - Sustainability Appraisal
  - Habitat Regulation Assessment
  - Liaison with infrastructure bodies/providers (such as the West Sussex County Council Education, NHS, utilities) to understand infrastructure constraints, inform potential policy wording and develop a package of mitigation as appropriate for inclusion within an updated Infrastructure Delivery Plan (IDP).
16. Following the results of the in-combination testing, the Council will review the implications of this for the "long list" of sites. At this stage, it is possible that sites included on the "long list" may need to be removed and not proposed for allocation, should unacceptable impacts be identified consistent with relevant policies in the NPPF.
17. The Council may also undertake without prejudice discussions with site promoters of sites on the long list, to inform work on the delivery trajectory, potential for joint working with other sites promoters, assess infrastructure requirements and inform drafting of site specific policies.
18. The Council will also engage with neighbouring Local Authorities where there is the potential for cross boundary impacts.