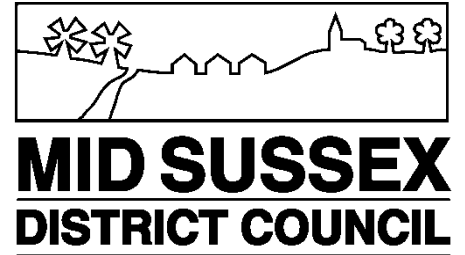


Mid Sussex District Council



Site Allocations DPD

TP3: Introduction to the Site Allocations DPD

December 2020

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References to the Sites DPD Document Library are expressed as [REF]

Site Allocations DPD - Summary

- The preparation of a Site Allocations DPD ('Sites DPD') was a requirement of adopted District Plan (March 2018) policy **DP4: Housing**, in order to meet residual housing and employment needs within the plan period to 2031.
- Policy DP4: Housing identified a residual housing requirement of **2,439** dwellings to be allocated within the Sites DPD.
- The Sites DPD is a 'daughter' document of the District Plan, seeking to meet residual needs rather than establishing strategy.
- Due to the time elapsed since the District Plan was adopted, the residual housing requirement is now **1,280** dwellings. This reflects additional completions and commitments within the two monitoring years since the District Plan was adopted.
- Updated employment evidence established a requirement for **10-15ha** additional employment land.
- A politically balanced Site Allocations Working Group (SAWG) was established to oversee the work, reporting their findings at all stages to the Council's Scrutiny Committee for Housing, Planning and Economic Growth (SCHPE) on a regular basis.
- Stage 1 of the Sites DPD process commenced in October 2017, with a formal "Call-for-Sites". The Council published a **SHELAA** in April 2018 which assessed **241 sites** against a robust methodology in accordance with the PPG and best practice. The methodology was transparent and subject to consultation.
- Stage 2 of the process was a high-level assessment of the sites against the District Plan strategy. The methodology and outcomes were reviewed by SAWG and SCHPE. This was published in **Site Selection Paper 1**.
- Stage 3 of the process was a detailed assessment of the remaining sites against a methodology established in **Site Selection Paper 2**. This methodology was overseen by SAWG, subject to consultation, and reviewed by SCHPE. The findings were published in **Site Selection Paper 3: Housing** and **Site Selection Paper 4: Employment**.
- The 47 sites assessed as having potential within Site Selection Paper 3: Housing and Site Selection Paper 4: Employment were considered 'Reasonable Alternatives' for the purposes of the **Sustainability Appraisal** and were subject to detailed evidence testing.
- Following assessment within the Sustainability Appraisal and detailed evidence testing, a total of **22 housing sites, 7 employment sites and a preferred location for a Science and Technology Park** were identified as the Council's preferred sites.
- The housing allocations yield **1,764** dwellings, therefore an **over-supply of 484 dwellings** compared to the residual housing need.
- The employment allocations yield **17.45ha**, therefore an **over-supply of 7.45-2.45ha** compared to the residual employment need.
- The Sites DPD also includes five additional policies that support the delivery of sustainable development in Mid Sussex.
- The Sites DPD is based on a **robust, proportionate evidence base** which is submitted alongside the DPD. A summary of the contents of this work and how it has influenced the DPD is contained within this paper.
- Full Council considered the sites and options for growth in September 2019 and approved the Sites DPD for Regulation 18 consultation.
- The Regulation 18 Sites DPD and associated documents were subject to consultation between 9th October and 20th November 2019, generating 2,124

comments from just over 1,300 respondents. Consultation was held in accordance with the Council's adopted **Statement of Community Involvement (SCI)**. Consultation responses are summarised in Statement of Consultation Regulation 18 (August 2020) [C2].

- SCHPE considered the responses to the **Regulation 18** consultation and actions to address objections in January 2020.
- The Sites DPD was revised to reflect comments received. SCHPE considered the Regulation 19 Sites DPD in March 2020. It was formally agreed by Full Council in July 2020.
- The **Regulation 19** Sites DPD was subject to an eight week consultation between 3rd August 2020 and 28th September 2020, generating 2,154 comments from 1,498 respondents. These are summarised in the Regulation 22 Statement (December 2020) [C1] and submitted in full.

The Council is satisfied that the Site Allocations DPD has been prepared in a robust manner, following the requirements of the NPPF, Planning Practice Guidance, best practice and subject to consultation and engagement in accordance with the Council's Statement of Community Involvement (SCI) and requirements under the Duty to Co-Operate. It therefore submits the Sites DPD for examination with confidence it meets the Test of Soundness and legal requirements.

1. Introduction

- 1.1. Mid Sussex District Council is submitting the Site Allocations Development Plan Document (the 'Sites DPD') to the Secretary of State for Examination. The Council has prepared the Sites DPD in accordance with legal and policy requirements and believes the Sites DPD meets the necessary legal and soundness tests. The Sites DPD has been prepared using a robust and transparent process, based on guidance, best practice and a proportionate evidence base.
- 1.2. This paper sets out the justification and processes carried out during the preparation of the 'Sites DPD' to assist the Inspector. The paper summarises each of the processes and signposts to the relevant parts of the Evidence Base where more detailed information can be found.

Role of the Site Allocations DPD

- 1.3. The District Plan 2014-2031, adopted in March 2018, sets out a commitment for the Council to prepare a Site Allocations DPD. The Sites DPD has four main aims, which are:
 - (i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - (ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - (iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development; and
 - (iv) to set out additional policies necessary to deliver sustainable development.
- 1.4. The role of the Sites DPD is therefore a 'daughter' document to the District Plan. It is the role of the District Plan to establish the spatial strategy and strategic policies. The Sites DPD has therefore been prepared with the purpose of meeting the strategy set out in the District Plan.
- 1.5. Some objectors have questioned whether the Sites DPD provides an opportunity to re-establish/re-calculate the district's housing requirement. The scope of the Sites DPD is clearly limited to allocating sites to meet the need established in the District Plan, as set out in policy DP4: Housing. The Council are of the opinion that it does not (having regard to the Court of Appeal judgment in *Oxted Residential Ltd v Tandridge DC* [2016] EWCA Civ 414 which supported the earlier judgment in *Gladman Development Ltd v Wokingham BC* [2014] EWHC 2320 (Admin)) need to reconsider housing need.
- 1.6. The District Plan is scheduled for review, commencing 2021 with adoption in 2023. The District Plan Review will provide the strategic basis for reconsidering the housing (and other) requirements, as well as strategic policies. Further details on this are set out in Section 3.

2. Site Allocations DPD – Legal Compliance and Soundness

Evidence Base	
Library Reference	Title
P2	Local Development Scheme (October 2017)
P1	Local Development Scheme (December 2020)
C4	Statement of Community Involvement (March 2019)
C2	Community Involvement Plan – Regulation 18 (September 2019)
C1	Community Involvement Plan – Regulation 19 (March 2020)
SUS5	Sustainability Appraisal – Scoping Report (May 2019)
SUS3	Sustainability Appraisal – Regulation 18 (September 2019)
SUS1	Sustainability Appraisal – Regulation 19 (July 2020)
HRA3	Habitats Regulations Assessment – Regulation 18 (September 2019)
HRA1	Habitats Regulations Assessment – Regulation 19 (March 2020)
HRA 5	Habitats Regulations Assessment – District Plan (September 2017)
DC1	Duty to Co-Operate Statement (August 2020 - Sites DPD)
DC2	Duty to Co-Operate Statement (August 2016 - District Plan)
DC3-DC25	Duty to Co-Operate – Statements of Common Ground
DPD4	PAS Self Assessment Toolkit

Legal Compliance

Local Development Scheme

2.1. The intention to prepare the Site Allocations DPD was first confirmed in the Local Development Scheme (LDS) published in October 2017 [P2]. The LDS has been kept up to date following alterations to the timetable for the preparation of the Plan, with the latest LDS being published in December 2020 [P1]. The Council's website (www.midsussex.gov.uk/SitesDPD) has also been kept up-to-date regarding the timetable to ensure all stakeholders are aware of the next steps.

Statement of Community Involvement

2.2. The Council's approach to consultation is set out in the Statement of Community Involvement (SCI) [C4], which is a 'code of practice' for how the council will engage people in planning processes.

2.3. The SCI commits the Council to prepare a 'Community Involvement Plan' for all planning policy documents. The Community Involvement Plan, published alongside the Regulation 18 [C2] and 19 [C1] consultation documents, set out how the document would be produced, how and when community involvement would take place and what happens to the results of community involvement in taking decisions. The main consultation methods to be used included:

- Press release, email alert and utilise social media where possible;
- Documentation available on Council website including an on-line response form;
- Hard copies of documents available at the District's libraries, District, Town and Parish Council offices and help points;
- Letters or emails to specific consultation bodies (statutory consultees) and to other organisations listed in the Community Involvement Plan

- 2.4. The Covid-19 outbreak meant that places where hard copies of the documents were usually made available were only partially open at the time the Regulation 19 consultation took place. However, the requirement to make consultation documents available was removed through The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020.
- 2.5. Therefore, this meant that consultation documents only needed to be made available online and not at the deposit points (Council offices, Libraries and Help Points). However, printed copies of the consultation documents were still sent to Libraries and Help Points, including the Council offices, to enable the documents to be viewed should the buildings re-open during the consultation period. A note explaining the availability of paper documents was published on the website.
- 2.6. The Regulation 19 consultation took place in accordance with the adopted SCI and Regulations in place at the time of consultation.

Sustainability Appraisal

- 2.7. Each stage of the Site Allocations DPD process has been accompanied by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) as required by the relevant legislation. For the purposes of the work and this Topic Paper, references to 'Sustainability Appraisal' mean both the SA and SEA, as they have been combined into one document. There have been three stages:
 - **Scoping Report** [SUS5] – setting out the baseline and Sustainability Framework (objectives and indicators), subject to consultation
 - **Regulation 18** [SUS3] – Accompanying the Regulation 18 Sites DPD, this report assessed the reasonable alternative development, site and policy options against the Sustainability Framework and helped inform the proposed site selection.
 - **Regulation 19** [SUS1] – Accompanying the Regulation 19 Sites DPD, this report included amendments required as a result of consultation on the previous version.
- 2.8. The Sites DPD is a daughter document to the District Plan, with the aim of meeting the residual housing and employment needs. The District Plan was accompanied by a Sustainability Appraisal which appraised reasonable alternatives for housing supply, housing requirement and strategy. As the overall requirement and strategy were 'set' within the District Plan, it is not the role of the Sites DPD SA to re-assess alternative approaches. Therefore, the SA focusses on the reasonable alternative options to meet the strategy and residual requirements set out within the District Plan.

Habitats Regulations Assessment

- 2.9. Ashdown Forest lies adjacent to the north-east boundary of Mid Sussex and within Wealden District. The Ashdown Forest Special Protection Area (SPA) is classified because of the presence of breeding populations of Dartford warbler and European nightjar. The Ashdown Forest Special Area of Conservation (SAC) is designated because of the heathland habitats.
- 2.10. The potential effects of development on Ashdown Forest were assessed during the Habitats Regulations Assessment (HRA) process for the Mid Sussex District Plan [HRA5]. The screening process undertaken in late 2007 and early 2008 identified likely

significant effects on the Ashdown Forest SPA and SAC as a result of recreational disturbance and atmospheric pollution respectively.

- 2.11. The District Plan HRA advises that measures are required to mitigate any potential recreational disturbance impact and District Plan Policy DP17 implements these recommendations. Natural England supports this policy.
- 2.12. The requirement for new residential development proposing a net increase in dwellings to provide mitigation is based on a zonal approach. The District Plan HRA recommends that residential development is not permitted within a 400m buffer zone around the Ashdown Forest SPA. This is on the basis that mitigation is unlikely to be successful since Ashdown Forest is within walking distance and people will use the site as their local recreation space.
- 2.13. As set out in paragraph 3.15 below, it was not possible to allocate sufficient housing to meet the full requirement in the District Plan as there was insufficient available information about the nature and location of development being proposed to meet the step in the trajectory to 1,090dpa. Therefore, it was not possible to establish if the uplift could be possible without causing further harm to the integrity of the Ashdown Forest SAC.
- 2.14. A Habitats Regulations Assessment of the Sites DPD [HRA1 and HRA3] has been undertaken and concluded that the Sites DPD does not present any potential risks to European sites, that are not considered capable of being mitigated for. Adverse effects on the integrity of the Ashdown Forest SAC/SPA, relating to air quality and recreation impacts can be ruled out.

Duty to Co-Operate

- 2.15. To support the preparation of Mid Sussex District Plan a Duty to Cooperate Framework was published in 2015. The Duty to Cooperate Statement (August 2016) [DC2] set out the engagement that had taken place with relevant local authorities and organisations during the preparation of the Mid Sussex District Plan. Through this evidence the Council was able to demonstrate that it had engaged constructively, actively and on an ongoing basis in the preparation of the District Plan, and that the Duty to Cooperate had been met.
- 2.16. The Sites DPD is a 'daughter document' of the District Plan. The cross boundary matters and discussions with organisations during the preparation of the Sites DPD have been on the basis that the strategic issues and matters relating to District Plan strategy have been previously agreed; as evidenced through the District Plan Duty to Cooperate statement. It is on this basis that the Duty to Cooperate responsibilities have been addressed with discussion focusing primarily on-site specific issues and matters. The Duty to Co Operate Statement has been updated for the Sites DPD [DC1].
- 2.17. Signed Statements of Common Ground [DC3-DC25] have been agreed with the following local authorities:
 - Adur and Worthing Councils
 - Arun District Council
 - Brighton and Hove City Council
 - Lewes District Council

- Horsham District Council
- Crawley Borough Council
- Tandridge District Council
- South Downs National Park Authority
- West Sussex County Council
- Surrey County Council
- East Sussex County Council

2.18. Signed Statements of Common Ground have also been agreed with the following public bodies:

- Environment Agency
- South East Water Ltd
- Thames Water Utilities
- West Sussex Clinical Commissioning Group
- Scotia Gas Network
- UK Power networks
- Highways England (in relation to the Science and Technology Park)
- Natural England
- Historic England (confirmation by email)

Policies Map

2.19. The Sites DPD is accompanied by a Policies Map. This builds upon the adopted District Plan policies map. It incorporates the following, as a result of the proposals within the Sites DPD:

- Site allocations (housing, employment and Science and Technology Park)
- Amendments to Built-Up Area boundaries, as a result of above and other required updates
- Existing Employment Sites, reflecting the content of policy SA34
- Safeguarded areas, as a result of policies SA35 - SA37
- Other required changes since adoption of the District Plan (e.g. including recently 'made' Neighbourhood Plans)

Soundness

2.20. The PAS self assessment toolkit [DPD4] has been completed during the preparation of the Plan and has been submitted as part of the suite of evidence documents that demonstrate the Plan's compliance with national policy, guidance and regulations.

2.21. The plan has been prepared in compliance with the Planning and Compulsory Purchase Act 2004¹, and other relevant regulations. The NPPF indicates that Plans can be found sound if they are:

- a) positively prepared
- b) justified
- c) effective, and
- d) consistent with national policy².

2.22. The following sets out how the Sites DPD meets these tests.

¹ Planning and Compulsory Purchase Act 2004

² *National Planning Policy Framework*. (2019). para. 35.

a) Positively Prepared

- 2.23. The Council consider the Sites DPD has been positively prepared. The Council has worked, and continues to work, in partnership with its neighbouring authorities under the Duty-to-Cooperate and has carried out an ongoing Sustainability Appraisal to ensure that the Sites DPD delivers sustainable development.
- 2.24. As the Sites DPD is addressing housing and employment need already established by the District Plan, these are less significant Duty-to-Cooperate matters in the context of the Site Allocations document itself. Clearly these matters will be reviewed again in the future through the Local Plan review process.
- 2.25. Other important Duty-to-Cooperate matters for Mid Sussex include giving consideration to potential impacts on the South Downs National Park, High Weald Area of Outstanding Natural Beauty (AONB) and the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The National Park Authority, AONB Board and Natural England have all been engaged during the preparation of the plan. It is considered that the plan does not negatively affect these matters.
- 2.26. Planning for strategic infrastructure, particularly for highways, is an important consideration, including for the Sites DPD, and the Council continues to work with West Sussex County Council as Highways Authority, Highways England, and other stakeholders. Additional transport policies are proposed and technical evidence has been prepared to inform the plan.
- 2.27. The Sites DPD identifies additional site allocations to 'fully' meet the objectively assessed development requirements for the district, including the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area (HMA) to be addressed within Mid Sussex.

b) A justified plan:

- 2.28. The Council consider the Sites DPD to be an appropriate strategy, taking into account the reasonable alternatives, and that the Plan is based on proportionate evidence.
- 2.29. The Sites DPD complements the District Plan and the additional allocations are consistent with the Spatial Strategy and Settlement Hierarchy. The District Plan was based on a comprehensive understanding of the issues facing the district and this baseline has been updated to inform the Sites DPD.
- 2.30. A series of reasonable alternatives were developed and considered to inform the Sites DPD. The reasonable alternatives have been assessed through the Sustainability Appraisal (SA).

c) An effective plan:

- 2.31. The NPPF states that plans are sound if they are: *"effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground"*

2.32. The Council has worked closely with landowners and developers to confirm that the additional sites proposed for allocation are deliverable. A Viability Study has been published alongside the Sites DPD.

2.33. The Council has worked closely with a range of organisations and key stakeholders such as West Sussex County Council, who are responsible for providing or managing key services, including education and transport, and the Environment Agency, Natural England and Historic England. Statements of Common Ground have been prepared with a series of key stakeholders and these are published alongside a Paper summarising the Council's approach to meeting its commitments under the Duty-to-Cooperate [DC1].

d) Consistent with National Policy:

2.34. The Council consider that the Sites DPD is consistent with national policy and the preparation has involved the testing of reasonable alternatives through a Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA). Both reports have been published alongside the Plan.

3. District Plan 2014- 2031

Evidence Base	
Library Reference	Title
DPD5	District Plan 2014 – 2031 (adopted March 2018)
H1	Windfall Study Update (July 2020)

- 3.1. The Mid Sussex District Plan [DPD5] was adopted in March 2018. It covers the plan period to 2031.
- 3.2. The District Plan sets out the district’s housing and employment needs and requirements and the strategy for meeting them. It contains a number of strategic site allocations which, combined with other commitments, identify the majority of supply to meet these. However, as identified in policy DP4: Housing, a Sites DPD is required to meet the residual amount.

District Plan Strategy

- 3.3. As set out in the supporting text to DP4: Housing, the spatial strategy of the District Plan is to focus the majority of housing and employment development at Burgess Hill, as it has greater potential to deliver sustainable communities and to benefit from the opportunities that new development can delivery. Smaller scale developments are set out at Pease Pottage (600 dwellings) and Hassocks (500 dwellings). The remainder will be delivered as sustainable developments in the towns and villages. These will also aim to support economic, infrastructure and social needs whilst maintaining the settlement pattern and protecting the quality of the rural and landscape character.
- 3.4. Policy DP4: Housing contains a settlement hierarchy. This places the most sustainable settlements at the top (Category 1) with the smallest (and least sustainable) settlements at the bottom (Category 5). The spatial strategy therefore proposes the majority of development at Category 1, with reducing levels in all categories below.

Category 1: Towns	Burgess Hill, East Grinstead, Haywards Heath
Category 2: Larger Villages	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint, Lindfield
Category 3: Medium Sized Villages	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly
Category 4: Smaller Villages	Ansty, Staplefield, Slaugham, Twineham, Warninglid
Category 5: Hamlets	Birch Grove, Brook Street, Hickstead, Highbrook, Walstead

Table 1 - Settlement Hierarchy

- 3.5. This over-arching strategy has been the basis for the site allocations proposed within the Sites DPD.
- 3.6. In addition, policy DP6: Settlement Hierarchy identifies the settlement hierarchy within the District. The supporting text sets out indicative growth levels for each of the

settlements. Whilst these are not policy, they give a basis for decision making during the site selection process.

- 3.7. The figures in the supporting text should not be treated as targets. The figures are largely ‘policy-off’ and do not take into account the range and suitability at sites within each settlement. However, the sites proposed within the Sites DPD are consistent with the settlement hierarchy in DP6, and are as consistent as possible with the figures in the supporting text. More detail on this is provided in Section 7.

District Plan Review

- 3.8. District Plan Policy DP4: Housing and DP5: Planning to Meet Future Housing Need, both commit the Council to undertaking a review of the District Plan starting in 2021, with submission to the Secretary of State in 2023. The timeline for the preparation of the District Plan review is set out in the Local Development Scheme published in December 2020.
- 3.9. The District Plan Review (and consequent update if required) provides the opportunity to re-assess strategic matters such as the housing requirement. The District Plan Review will consider which/if any policies in the District Plan will need to be updated and involve the commission and consideration of new evidence. In particular, this will be the vehicle to consider the implications of revised housing need evidence, such as the result of the Government’s Standard Method calculation of housing need. At this point in time, the Government are consulting on a revised methodology for the Standard Method which will have implications on the final result.
- 3.10. The implications and considerations related to this will be explored during preparation of the District Plan Review. It is not the role of the Sites DPD to re-establish the housing requirement. The District Plan Review will be the appropriate time to consider the implication of the standard method on the housing requirement and if the requirements for specialist accommodation such as gypsies and travellers and the elderly need to be updated.
- 3.11. The District Plan Review will be an opportunity to re-promote sites that did not conform to the current District Plan strategy and policies. Whilst the Council operates an open call for sites, with promoters being able to submit sites at any time, a proactive call for sites will commence in December 2020.

District Plan Housing Requirement

- 3.12. The Mid Sussex District Plan (2014 – 2031) was adopted in March 2018. The District Plan sets the housing requirement of 16,390 for the District until 2031. This requirement ensures the District’s objectively assessed housing need of 14,892 dwellings is met and provides for 1,498 dwellings to ensure unmet need in the Northern West Sussex Housing Market Area is addressed³. The housing requirement is to be delivered using a stepped trajectory of:
- **876** dwellings per annum (dpa) 2014/15 – 2023/24 and
 - **1,090** dpa thereafter to 2030/31.
- 3.13. Policy DP4: Housing sets out how the housing requirement will be delivered:

³ The Northern West Sussex Housing Market Area is made up of Crawley Borough and Horsham and Mid Sussex District’s. The unmet need is generated by Crawley Borough.

- Existing commitments – including sites with planning permission and other allocations
- Strategic Sites allocated in the District Plan – North and north-west Burgess Hill; Kings Way, Burgess Hill; Pease Pottage; and Clayton Mills, Hassocks
- Windfall allowance
- Other sites as allocated through future Neighbourhood Plans and the Site Allocations DPD.

3.14. It is clear from DP4 that it has always been the intention that the Sites DPD is a 'daughter' document of the District Plan as its purpose is to ensure the District Plan housing requirement is met in full.

3.15. It was not possible to allocate sufficient housing to meet the District Plan requirement in full in the District Plan itself. This was due to the housing requirement increasing significantly during the course of examination. The Inspector agreed that the sites required to meet the 'residual' need as a result of the housing requirement increasing (i.e. the step in trajectory), could be identified in a future DPD (i.e. the Sites DPD). As there was insufficient information available about the nature and location of development proposed to meet the step in the trajectory, it was not possible to establish if the uplift could be possible without causing further harm to the integrity of the Ashdown Forest SAC.

3.16. Further information about the Habitat Regulations Assessment that has been prepared to support the Site Allocations DPD is set out in section 2 which demonstrates the step in trajectory is achievable in HRA terms, given the nature and location of development sites proposed in the Sites DPD.

Housing - Residual Requirement

Adopted District Plan Position

3.17. DP4: Housing sets out the sources of supply that will deliver the housing requirement, as set out below.

Category	Number of Dwellings
Housing Requirement for the full plan period (April 2014 to March 2031)	16,390
<i>Completions 2014/15</i>	630
<i>Completions 2015/16</i>	868
<i>Completions 2016/17</i>	912
<i>Total Housing Commitments (including sites with planning permission, strategic development at Kings Way, Burgess Hill (DP8) and Pease Pottage (DP10) and allocations in made Neighbourhood Plans)</i>	7,091
Strategic development north and north-west of Burgess Hill	3,500
Land north of Clayton Mills Hassocks	500
Windfall Allowance (45dpa x 10 years of plan period from year 6 onwards)	450
Elsewhere in the District, as allocated through future Neighbourhood Plans and the Site Allocations Document	2,439

Table 2 - Extract from District Plan Policy DP4: Housing

3.18. At the time the District Plan was adopted the residual amount to be met was **2,439** dwellings.

Updates to the Residual Housing Figure since District Plan adoption

3.19. The residual housing figure has changed during the course of the preparation of the Sites DPD to reflect updated monitoring, as dwellings are completed and additional sites granted planning consent. The residual figure was updated for the Regulation 18 Sites DPD (2019), as is set out below:

Category	Number of Dwellings
Housing Requirement for the full plan period (April 2014 to March 2031)	16,390
<i>Completions 2014/15</i>	<i>630</i>
<i>Completions 2015/16</i>	<i>868</i>
<i>Completions 2016/17</i>	<i>912</i>
<i>Completions 2017/18</i>	<i>843</i>
<i>Completions 2018/19</i>	<i>661</i>
Total Housing Completions (April 2014 to March 2019)	3,914
<i>Total Housing Commitments (including sites with planning permission, strategic development at Kings Way, Burgess Hill (DP8) and Pease Pottage (DP10) and allocations in made Neighbourhood Plans)</i>	<i>7,094</i>
District Plan allocations	3,287
Windfall Allowance (84 dpa x 7 remaining years of plan period from year 6 onwards)	588
Elsewhere in the District, as allocated through future Neighbourhood Plans and the Site Allocations Document	1,507

Table 3 - Adapted from Site Allocations DPD Regulation 18 Consultation Draft (October 2019)

3.20. The table above shows that, at the 1st April 2019, the residual figure reduced to **1,507** dwellings. This is explained by an additional two years of housing completions and permissions granted on sites that had not been allocated. At this stage the supply from windfall sites was also increased from an allowance of 45 units per annum (as set out in the District Plan) to 84 units per annum following a review of the delivery on windfall sites in the two monitoring years that had elapsed since the District Plan position was set out, and the updated NPPF [O2]. The number of units expected to be delivered within the plan period on the strategic allocations at Burgess Hill was also revised from 3,500 to 3,287 to reflect a change in delivery rate based on updated information from the developer, and is reflected in table 2 above.

3.21. The residual figure has been updated again for the Site Allocations DPD Submission draft (August 2020) to include information from monitoring year 2019/20, as set out below:

Category	Number of Dwellings
Housing Requirement for the full plan period (April 2014 to March 2031)	16,390

Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Completions 2017/18	843
Completions 2018/19	661
Completions 2019/20	1,003
Total Housing Commitments (including sites with planning permission and allocations in made Neighbourhood Plans)	9,689
Windfall Allowance (84 dpa x 6 years of remaining plan period from year 6 onwards)	504
Residual Housing Requirement	1,280

Table 4 - Site Allocations DPD Regulation 19 Submission Draft (August 2020)

3.22. The Site Allocations DPD is required to meet an updated residual housing requirement of **1,280**. The allocation of a minimum of 1,280 dwellings will provide a sufficient number to meet the requirement. However, it is important to note that the housing target set in DP4: Housing is the minimum amount of housing required. In addition, some housing over-supply provides additional flexibility and resilience to the housing land supply.

District Plan Employment Requirement

Evidence Base	
Library Reference	Title
E1	NWS Economic Growth Assessment (2014)
E2	NWS Economic Growth Assessment Update (2020)
SSP4	Site Selection Paper 4: Employment (February 2020)

3.23. The Northern West Sussex Economic Growth Assessment (2014) [E1] outlined the baseline economic position within Mid Sussex and neighbouring authorities within the Functional Economic Market Area (Crawley and Horsham). This was updated in 2020 [E2]. Economic forecasting was used to predict a jobs-based requirement of 521 additional jobs per annum, which equated to approximately 25ha of employment land (B1, B2 and B8 uses). This was tested a year later within the Burgess Hill Employment Sites Study update, which confirmed this requirement for an additional 25ha of employment land.

3.24. This position was reflected in policy DP1: Sustainable Economic Development of the District Plan. The number of jobs expected to arise as a result of increased housebuilding was 543 jobs per annum, therefore closely matching the 521 jobs per annum anticipated through forecasting. The policy also include provision of 25ha employment land.

Employment – Residual Requirement

- 3.25. District Plan policy **DP1: Sustainable Economic Development** seeks to support economic growth within the district. Due to the increase in housing requirement during the District Plan examination, the Sites DPD presents an opportunity to assess the amount of employment land required as a result. Policy DP1 states the intention for further sites to be allocated within the Sites DPD.
- 3.26. Updated employment forecasts, commissioned by the Council to take account of the recent employment forecast statistics, identified that a total requirement of around 35 to 40 hectares of employment land is needed up to 2031. As 25 hectares employment land has already been allocated within District Plan Policy DP1, this leaves a residual requirement of 10-15 hectares to be allocated within the Site Allocations DPD.
- 3.27. The DPD also reflects changes in circumstances since the District Plan was adopted. This includes the reduction in proposed employment land at the Northern Arc (Burgess Hill) – originally allocating 10ha but reduced to 4ha, and additional employment land commitments since adoption (totalling 6.3ha) which make up for this shortfall. These are set out in detail within Site Selection Paper 4: Employment [SSP4].
- 3.28. In addition, District Plan policy DP1: Sustainable Economic Development identifies a broad location for a Science and Technology Park to the west of Burgess Hill, to support research and development and provide high quality employment for the wider area. The principle of the allocation within the District Plan and location itself was based upon a range of documents which assessed deliverability, market demand, feasibility and suitability. The Site Allocations DPD seeks to allocate a specific site for the Science and Technology Park.
- 3.29. The Science and Technology Park does not contribute towards the District's employment need – this is being met by smaller-scale allocations proposed within the District Plan and policies SA2 – SA8 of the Sites DPD. The employment land and jobs generated by the Science and Technology Park are therefore in addition and reflect the Council and Local Enterprise Partnership's (LEP's) aspirations for economic growth.

4. Preparation of the Site Allocations DPD

- 4.1. As indicated in Section 3, District Plan Policy DP4: Housing committed the Council to commencing the preparation of a Sites DPD in 2017. A Local Development Scheme published in October 2017 confirmed the timetable for the preparation of the DPD [P2]. The preparation of the Sites DPD commenced in October 2017.
- 4.2. The following sections (5 to 10) set out the process followed in the preparation of the Sites DPD.
 - Section 5: Governance
 - Section 6: Site Selection Process
 - Section 7: Housing – Site Selection Outcomes
 - Section 8: Employment – Site Selection Outcomes
 - Section 9: Evidence Base
 - Section 10: Proposed Site Allocations
 - Section 11: Additional Policies

5. Site Selection Process – Governance

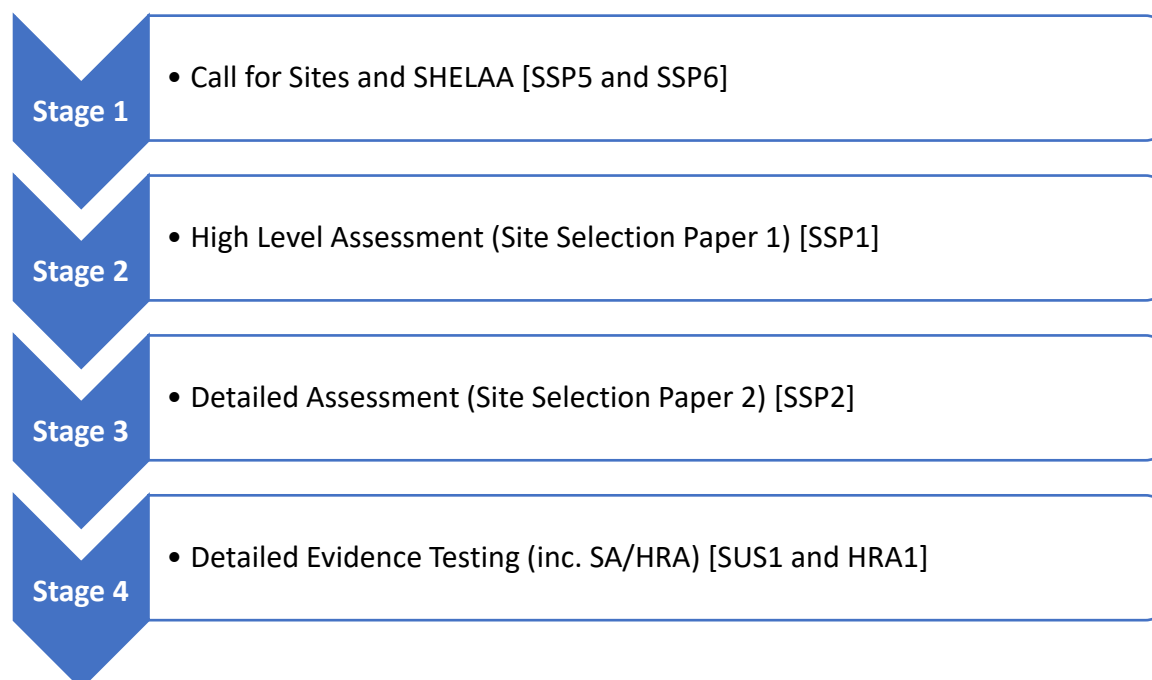
Governance

- 5.1. The preparation of the Sites DPD was overseen by the Council's Scrutiny Committee for Housing, Planning and Economic Growth (SCHPE), who scrutinised the preparation of the Plan at key stages. In addition, a task and finish member working group was also established to support the preparation of the Plan. The terms of reference of the group can be found in the examination library [P3]. The politically balanced Site Allocations Working Group (SAWG) were consulted on a range of technical work, including the methodology for the preparation of the SHELAA and Site Selection Paper, the assessment of sites and the development of options. The work of SAWG was reported to SCHPE at regular intervals during the preparation of the Plan.
- 5.2. In addition to Member oversight of the work, a Developer Liaison Group (DLG) was also established to enable representatives of the development industry to have early involvement in the preparation of the Plan. The Group were updated at regular stages and were invited to comment on the proposed SHELAA and the Site Selection methodologies.
- 5.3. Whilst the SAWG and SCHPE guided and informed the process, all formal stages of the Sites DPD were signed off by Full Council. The work of the SCHPE, SAWG and DLG were reported to meetings of Full Council who gave final approval to the Regulation 18 and Regulation 19 Plans as well as approval to submit the Sites DPD for Examination.

6. Site Selection Process

Evidence Base	
Library Reference	Title
DPD5	Mid Sussex District Plan (2018)
SSP6	SHELAA (2018)
SSP5	SHELAA (2020)
SSP1	Site Selection Paper 1 (February 2020)
SSP2	Site Selection Paper 2: Methodology (December 2018)
SSP3	Site Selection Paper 3: Housing (February 2020)
SUS3	Sustainability Appraisal – Regulation 18 (September 2019)
SUS1	Sustainability Appraisal – Regulation 19 (July 2020)
P4	Scrutiny Committee for Housing and Planning (17.01.18)

Overview



Stage 1: Strategic Housing and Employment Land Availability Assessment (SHELAA)

- 6.1. The first stage in the preparation of the Site Allocations DPD was to refresh the SHELAA that had been prepared to inform the District Plan. The opportunity was taken to review how the SHELAA was produced and presented and take into account comments made on the SHELAA during the District Plan Examination. The review of the SHELAA was undertaken in line with best practice, was open and transparent and subject to consultation, resulting in a robust document.
- 6.2. Planning Practice Guidance requires that, when the SHELAA assessment process is reviewed, Local Planning Authorities should work with neighbouring Local Planning Authorities in the housing market area and the functional economic market area. The PPG also notes that from the earliest stages of plan preparation, developers, land

promoters, parish and town councils preparing Neighbourhood Plans and others should be involved.

- 6.3. Officers consulted the following groups on the SHELAA methodology:
- Developer Liaison Group
 - Neighbouring Local Authorities – Crawley, Horsham, Brighton and Hove, Adur and Worthing, Eastbourne and Lewes Councils
 - Town and Parish Councils
- 6.4. All consultees were asked to submit comments, and advised that if no response was submitted, it would be taken that they had no objections to the proposed methodology. A number of comments were received, and changes were made to the methodology where required.
- 6.5. Members of the Scrutiny Committee for Housing and Planning (17.01.18) [P4] were also asked to consider the responses received during the consultation and the proposed revised methodology.
- 6.6. The SHELAA provides a factual list of sites nominated for development and identifies those sites which should not be considered further because of absolute constraints to development on those sites. Sites that could accommodate less than 5 residential units were also excluded from further assessment.
- 6.7. The Council has an 'always open' call for sites but a proactive call for sites took place in October 2017. The SHELAA was published in April 2018 [SSP6], and this provided the palette of housing sites for the site selection process of the Site Allocations DPD. Additional sites submitted until August 2018 were added as an addendum to the April 2018 version. No further sites were added after August 2018 to enable the technical work on sites to be carried out in preparation of the 2018 SHELAA.

Site Selection Methodology

- 6.8. At the same time as consultation on the SHELAA methodology took place, the same organisations were also consulted on the broad principles of the proposed site selection process. Again, adjustments were made based on the feedback received. Members of the Scrutiny Committee for Housing and Planning (17.01.18) were also asked to consider the site selection process, including the comments made and suggested changes that arose during the consultation.
- 6.9. The detailed site assessment stage of the process was refined further into a set of site selection criteria to ensure there was a robust and transparent framework in place. The site selection criteria were subject to further consultation with the following:
- Developer Liaison Group (meeting held 3rd October 2018)
 - Neighbouring Local Authorities – Crawley, Horsham, Brighton and Hove, Adur and Worthing, Eastbourne and Lewes, Wealden and Tandridge Councils
 - Town and parish Councils (meeting held 8th October 2018)
- 6.10. All consultees were given the draft methodology to review and were asked to submit comments. Consultees were advised that if no response was submitted, it would be taken that they had no objections to the proposed methodology. Feedback was

received from 11 respondents and changes were made to the methodology where appropriate.

6.11. The Site Allocations Member Working Group (SAWG) and Scrutiny Committee for Communities, Housing and Planning (21.11.18) also considered the proposed methodology, taking into account comments made during the consultation with further amendments made as a result.

6.12. The final site selection criteria are set out in Site Selection Paper 2: Methodology for Site Selection [SSP2]. Site Selection Paper 2 establishes detailed assessment criteria which are grouped into three parts. A total of 17 criteria were used to assess housing sites, 19 for employment sites. The complete list of these criteria is summarised below:

Housing Sites Criteria

1. Planning constraints	2. Deliverability considerations	3. Sustainability/ accessibility
<ul style="list-style-type: none"> • AONB 	<ul style="list-style-type: none"> • Highways/Strategic Road Network 	<ul style="list-style-type: none"> • Education – primary schools
<ul style="list-style-type: none"> • Flood risk 	<ul style="list-style-type: none"> • Local Road Network 	<ul style="list-style-type: none"> • Health – GP distance to surgery
<ul style="list-style-type: none"> • Ancient woodland 	<ul style="list-style-type: none"> • Developability 	<ul style="list-style-type: none"> • Distance to town centre services
<ul style="list-style-type: none"> • SSSI/Local Wildlife Sites/Local Nature Reserves 	<ul style="list-style-type: none"> • Infrastructure 	<ul style="list-style-type: none"> • Public transport
<ul style="list-style-type: none"> • Heritage – listed building 		
<ul style="list-style-type: none"> • Heritage – conservation area 		
<ul style="list-style-type: none"> • Archaeology 		
<ul style="list-style-type: none"> • Landscape capacity/suitability (excluding AONB sites) 		
<ul style="list-style-type: none"> • Trees/TPOs 		

Table 5 - Housing Sites Criteria

Employment Sites Criteria

1. Planning constraints	2. Accessibility	3. Market/Jobs demand
<ul style="list-style-type: none"> • AONB 	<ul style="list-style-type: none"> • Highways/Strategic Road Network/Access 	<ul style="list-style-type: none"> • Public and sustainable transport
<ul style="list-style-type: none"> • Flood risk 	<ul style="list-style-type: none"> • Strategic Road Access 	<ul style="list-style-type: none"> • Compatibility of adjoining uses
<ul style="list-style-type: none"> • Ancient woodland 	<ul style="list-style-type: none"> • Infrastructure 	<ul style="list-style-type: none"> • Proximity to labour force

<ul style="list-style-type: none"> • SSSI/Local Wildlife Sites/Local Nature Reserves 	<ul style="list-style-type: none"> • Availability 	<ul style="list-style-type: none"> • Market Attractiveness
<ul style="list-style-type: none"> • Heritage – listed building 	<ul style="list-style-type: none"> • Achievability 	<ul style="list-style-type: none"> • Visibility and Prominence
<ul style="list-style-type: none"> • Heritage – conservation area 		
<ul style="list-style-type: none"> • Archaeology 		
<ul style="list-style-type: none"> • Landscape capacity/suitability (excluding AONB sites) 		
<ul style="list-style-type: none"> • Trees/TPOs 		

Table 6 - Employment Sites Criteria

6.13. Officers undertaking the assessment graded the potential impact on each of the criteria using a five tier 'traffic light' system, as below. SSP2 explains the relative weighting given to each of the criteria, to ensure that comparisons between sites take account of the fact that some constraints (e.g. AONB) have more significant negative impacts and weight afforded to them than (for example) distance to a bus stop.

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

6.14. The assessment of each site against the criteria was evidence-based. In order to ensure a robust and consistent approach, site information was sent to relevant statutory bodies and organisations for their comments and assessment.

6.15. For example, all impacts for the AONB criteria were determined by the High Weald AONB Unit, Heritage/Conservation by the Council's Conservation Officer, and Archaeology by West Sussex County Council's Archaeological Advisor. Deliverability information was based upon the responses provided by each site promoter to a Deliverability Questionnaire which asked promoters to provide information related to land ownership agreements/options, infrastructure requirements and phasing.

7. Housing Site Selection Outcomes

Evidence Base	
Library Reference	Title
SSP1	Site Selection Paper 1 (February 2020)
SSP3	Site Selection Paper 3: Housing (February 2020)
SUS3	Sustainability Appraisal – Regulation 18 (September 2019)
SUS1	Sustainability Appraisal – Regulation 19 (July 2020)

7.1. Housing Site Selection was carried out in accordance with the four stage process set out in Section 6, using the SHELAA (Stage 1) as the starting ‘pool’ of sites.

Stage 2: Site Selection Paper 1 - High level Site Assessment

7.2. Site Selection Paper 1: Assessment of Housing Sites against District Plan Strategy [SSP1] was first published in September 2018. Site Selection Paper 1 presents the high-level assessment of the initial 236 sites against the District Plan Strategy, as per District Plan Policies DP4: Housing and DP6: Settlement Hierarchy. The criteria used to make this assessment are:

- the degree of connectivity between each site and its ‘host’ settlement; and
- the size of each site relative to its settlement’s position on the hierarchy and its indicative housing requirement

7.3. To assess the degree of connectivity with a settlement, sites within 150m of the current built-up area boundary were considered in principle to function as part of that settlement. Sites beyond 150m were considered to be remote from a settlement. It was recognised that this distance should be used as a guide rather than a definitive line as in practice this may vary slightly based on site-specific considerations, such as access constraints, topography or biodiversity designations which impact the site’s functional connectivity with a settlement.

7.4. The outcome of this assessment is published as Site Selection Paper 1. 236 sites were tested against the two key criteria of the strategy at this stage, of which **91 were excluded** and 145 were taken forward for detailed testing (Stage 3). The conclusions of Site Selection Paper 1 were reviewed by the SAWG and considered by the Housing, Planning and Community Scrutiny Committee (25.09.2018).

Stage 3: Site Selection Paper 3 - Detailed Site Assessment

7.5. The detailed site assessment work took place in late 2018 / early 2019. During this time amendments were made to the palette of sites (e.g combining adjacent sites, withdrawal of sites), based on information available during this time. Therefore 142 sites, rather than 145, were subject to detailed site assessment sites and were assessed using the Site Selection Methodology set out in Site Selection Paper 2 [SSP2]. All sites in a given settlement were ranked in relation to each other on the basis of their overall performance against the 17 site selection criteria in order to determine the most suitable sites for allocation, cognisant of the need to be consistent with the strategy set out DP4/DP6 of the District Plan.

7.6. A degree of professional judgement was required as the criteria were not assumed to be of equal weight, meaning the overall performance was therefore not simply a tally of

how many scored very positively → very negatively (i.e. a scoring system was not used as this would over-simplify the process and not account for weighting between criteria).

- 7.7. The Site Selection assessments were published in Site Selection Paper 3: Housing [SSP3].
- 7.8. Following the conclusion of the detailed site assessment, a supplementary ‘fact checking’ exercise was undertaken on all 142 sites to ensure factual accuracy of results. This involved sharing the Council’s draft assessment against the 17 site assessment criteria (which are included in Appendix B of the SSP3) with the promoter of that site. Site proponents were asked to ‘fact check’ the pro formas at this stage and then report any identified factual errors to the Council.
- 7.9. This process provided site proponents the opportunity to verify quantitative conclusions (such as the calculated distance from a site to the nearest school) or note if the assessment had overlooked proximity to a key feature or service which might affect the overall suitability of the site. It also provided an opportunity to review the way in which officers applied the Council’s assessment methodology, though the fact checking exercise was not designed to be a forum for disputing qualitative findings and professional judgement of officers. Updates were made to the assessments where relevant. This process was also scrutinised by the Member Site Allocations Working Group in April 2019.
- 7.10. 142 sites were tested at this stage, of which **95 sites were excluded** and **47 were taken forward**. A summary of the reasons for excluding sites at this stage is presented below. This identifies the principal reason for exclusion, however in many instances there was more than one reason. Whilst, for some, mitigation may have been possible, it was judged that the 47 sites were better performing (therefore less mitigation required), were more consistent with the District Plan strategy and could demonstrate deliverability.

Principal reason for exclusion	Number of sites excluded during stage 3
Impact on the AONB	23
Access constraints	8
Impact on a SSSI / SNCI	4
Impact on a Conservation Area	12
Impact on listed building	6
Impact on landscape or townscape setting and character	12
Developer unable to demonstrate deliverability within the plan period	20
No longer available or revised yield below allocation threshold of 9 dwellings	10
TOTAL	95 sites

Table 7 - Site Selection: Reasons for Exclusion

Stage 4: Detailed Evidence Testing

- 7.11. The final stage of the site selection process involved further detailed and technical evidence for the remaining 47 sites. This included the findings of the Sustainability Appraisal [SUS1 and SUS3], input from infrastructure providers and technical

specialists within the District Council and West Sussex County Council (WSSCC) as well as Habitats Regulation Assessment (HRA) and modelling of traffic and air quality impacts by specialist consultants.

7.12. The Sustainability Appraisal assessed each of the 47 reasonable alternatives against the sustainability framework. The conclusion from this was that 20 sites performed well both individually, and relative to other sites within the same settlement. These were assessed as being compliant with the District Plan strategy. Overall, 12 sites performed marginally – positives generally outweighed negatives however this was more finely balanced than for the sites performing well, therefore other options may be more suitable. The remainder performed poorly – negative impacts outweighed positives and there were better options available either within the settlement or settlement category. These sites were rejected.

Final Site Selection

7.13. The remaining 47 sites provided 3 ‘Reasonable Alternative’ supply options which were assessed through the Sustainability Appraisal (SA) [SUS1 and SUS3]. The assessment of these options was also informed by detailed engagement with a range of stakeholders and experts, and by detailed evidence for Transport, Air Quality and the Habitats Regulation Assessment (HRA). This ‘detailed evidence testing’ was undertaken iteratively alongside the preparation of the SA.

7.14. The SA notes that the allocation of the 20 ‘perform well’ sites would only just meet the residual housing requirement, which did not provide sufficient flexibility or resilience. It was therefore necessary to consider the inclusion of ‘marginal sites’ to supplement the supply. A more detailed assessment of the marginal sites was set out in the SA (Reg 19 - Table 17).

7.15. The three options considered within the SA were as follows⁴:

Option Number	Description
1	20 ‘Perform Well’ sites providing 1,619 dwellings This option ensures the necessary residual is met with a small additional supply of 112 dwellings
2	Option 1 plus x2 additional ‘marginal’ sites at Burgess Hill providing 1,962 dwellings This option provides for a larger additional supply of 455 dwellings
3	Option 1 plus x1 additional ‘marginal’ site at Haywards Heath providing 2,249 dwellings This option provides for a higher additional supply of 742 dwellings

⁴ Note: additional supply figures in Table 8 were based on the position within the Regulation 18 document. The residual figures have been amended at Regulation 19 based on the completion of one further monitoring year.

Table 8 - Sustainability Appraisal: Site Options

7.16. Option 2 was considered to be the best performing option overall and therefore recommended as the most appropriate option for inclusion in the Draft Sites DPD. This ensures the residual is fully met, it provides a reasonable over-allocation to provide flexibility, provides a range of sites of a variety of sizes and best delivers District Plan policies DP4 and DP6. It also ensures that any potential impacts relating to highways, air quality or Habitats Regulations Assessment (HRA) are minimised.

7.17. Scrutiny Committee for Housing, Planning and Economic Growth (11.09.19) considered the site selection process and recommended Option 2 to Council. Council (25.09.19) approved 'option 2' and agreed that 22 housing sites should be proposed for allocation in the Site Allocations Document. A summary of the Site Selection process is set out below:

Stage	Description	No. of Sites	Sites that meet criteria
1) Call for Sites & Preparation of SHELAA <ul style="list-style-type: none"> Call for sites – notification of sites to Council from land owners, site promoters and interested parties Identify pool of 'potential' development sites based on high level assessment of 'suitability, availability and achievability'. 	Sites submitted by promoters during the Call for Sites. Sites assessed against the SHELAA methodology	241	233
2) High Level Assessment [SSP1] <ul style="list-style-type: none"> High Level assessment to test conformity with the District Plan Strategy, in particular: <ul style="list-style-type: none"> If sites are located more than 150m from existing settlement and so deemed to be located in open countryside If sites are of a scale not compatible with the Site Allocations Document and more suited for consideration through a future Local Plan Review 	91 sites removed that were not compliant with the District Plan strategy (based on distance from existing settlements and yield)	233	142
3) Detailed Assessment [SSP3] <ul style="list-style-type: none"> Detailed Assessment against a range of 17 assessment criteria Fact Check - consultation with Site Promoters to fact check key assessment findings or assumptions 	142 sites assessed against detailed criteria – 17 criteria for housing, 19 for employment. Criteria approved by the working group and considered by Scrutiny Committee.	142	47
4) Detailed Evidence Testing [SUS3 and SUS1]	47 sites subject to additional refinement	47	23

<ul style="list-style-type: none"> • Additional site filter/ refinement incorporating Sustainability Appraisal of sites at Settlement level • Consultation with Key Stakeholders, Infrastructure Providers and Specialist Officers • Consideration of additional Technical Evidence (Transport, Air Quality, HRA, Viability) • Refine shortlisted sites and identify Reasonable Alternative Options to inform Sustainability Appraisal 	<p>within the Sustainability Appraisal, consultation with stakeholders, consideration of technical evidence</p>		
<p>5) Identified Preferred Option</p>	<p>22 housing sites included within the Regulation 18 Sites DPD</p>	<p>22⁵</p>	

Table 9 - Summary of Site Selection Process and Outcomes

Update following Regulation 18 Consultation Draft Site Allocations Document

7.18. The Draft Site Allocations Document was subject to consultation commenced on 9th October 2019 and 20th November 2019. During the consultation 58 site promoters objected to the draft Sites DPD on the grounds that their site had not been included as a proposed allocation. Of these, 20 'new' housing sites were submitted that were not in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and therefore had not been assessed in the Site Selection process.

7.19. Officers re-assessed the existing sites and assessed the new sites against the agreed criteria and set out the results of the assessment in a revised version of Site Selection Paper 1: Housing and Site Selection Paper 3: Housing.

7.20. In total, 3 of the sites were not compliant with the District Plan strategy and were therefore excluded from further consideration. 17 sites were subject to detailed assessment against the 17 site selection criteria. Of these, 13 sites did not meet the assessment criteria and therefore did not progress to the next stage. 4 sites progressed to stage 4, the shortlist of reasonable alternatives increased from 47 to 51 sites. Sites that progress to Stage 4 are subject to additional assessment within the Sustainability Appraisal. This assessment concluded that these sites should not be included within the site allocations DPD. A summary of the updated site selection process is out below.

7.21. Due to the completion of a further monitoring year, the residual requirement (set out in SA10) was updated ahead of Regulation 19 stage. As a result of additional commitments and completions within monitoring year 2019/20, the residual housing requirement reduced from 1,507 to 1,280. However, the Council did not remove any sites between Regulation 18 and 19 as a result, therefore marginally increasing a healthy over-supply. Further details are set out in Section 3.

⁵ Two adjacent sites merged to form 1 site in the DPD, hence a change from 23 to 22 allocated sites in the DPD.

- 7.22. Scrutiny Committee for Housing, Planning and Economic Growth (11.03.20) and Council (22.07.20) approved the 22 sites for inclusion in the Submission draft DPD.

Meeting District Plan Strategy

- 7.23. As set out in section 3 above, the objective of the Site Allocation DPD is to ensure the housing requirement is met in full in accordance with the strategy set out in DP4 and DP6, as far as possible. Site Selection Paper 2: Methodology [SSP2], explains how the site selection process will seek to deliver the strategy set out in the District Plan. Paragraph 2.9 states:

“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”.

- 7.24. Paragraph 2.10 goes onto state:

“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.”

- 7.25. Site Selection Paper 3: Housing, also explains how the Site Allocations DPD is seeking to meet the spatial distribution of the District Plan. Paragraph 2.4.5 states:

“The District Plan Strategy in DP4 is to concentrate growth in the larger settlements. Where the results of the site assessment exercise were found to leave a shortfall in capacity at one settlement hierarchy category the aim is that this shortfall would be met in the category above. For example, in the absence of sufficient suitable, available and developable sites in Category 3 the residual need is passed up to the settlements within Category 2, and so on. If, having been through the site assessment process, it was found that there were still too few sites to meet the settlement category requirement, the methodology recognises that it could be necessary to repeat the site assessment process and seek ‘next best’ site options.

- 7.26. Policy SA10: Housing Requirement provides an update to the minimum residual figures set out in DP6 of the District Plan. The minimum residual housing figure has been calculated using the same methodology applied within the District Plan. Further details can be found in Parish OAN Distribution Methodology [H3]. The Table from SA10 is set out below and shows that Category 1 settlements are providing more than the minimum requirement by 703 (484 of which is the ‘over-supply’ against the residual figure), Category 2 settlements are under providing by 93 and Category 3 settlements are under providing by 133.

- 7.27. Therefore, following the application of the Site Selection methodology, sites have been allocated consistently with the overall District Plan strategy. In particular, where insufficient sites have been identified at any particular tier to meet the indicative number given in the supporting text to DP6, allocations have been made at settlements in the more sustainable Category 1. The only exception to this is at Tier 4, where sites have been allocated for an additional 7 dwellings. This marginal increase

over the indicative requirement for Tier 4 is sufficiently small that it does not affect the strategy overall. The over-allocation at Tier 1 largely reflects the over-supply proposed within the Sites DPD for resilience and flexibility. As set out in the SA, it is logical and most sustainable for any additional proposed supply to be located at the highest of settlement tiers.

Settlement category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Haywards Heath	10,653	706	1,409 (+703)
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks Hurstpierpoint Lindfield	3,005	198	105 (-93)
3 – Medium Sized Village	Albourne Ardingly Ashurst Wood Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	238 (-133)
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warninglid	82	5	12 (+7)
5 – Hamlets	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walsted	N/A *	N/A *	N/A *
Total		16,390**	1,280	1,764 (+484)

Table 10 - Extract from SA10 Spatial Distribution of housing requirement

8. Employment Site Selection Outcomes

Evidence Base	
Library Reference	Title
SSP4	Site Selection Paper 4: Employment (February 2020)
SUS3	Sustainability Appraisal – Regulation 18 (September 2019)
SUS1	Sustainability Appraisal – Regulation 19 (July 2020)
DC17	Science & Technology Park SoCG

- 8.1. Employment Site Selection was carried out in accordance with the four stage process set out in Section 6, using the SHELAA (Stage 1) as the starting ‘pool’ of sites.
- 8.2. A total of **18** employment sites were either promoted to the Council through the ‘Call for Sites’ process or identified as having employment potential in the SELAA and are therefore candidate sites to be considered for allocation through the Site Allocations DPD process.
- 8.3. Given the relatively small number of sites to choose from and no settlement distribution policy equivalent to DP6 related to employment land, the Site Selection process was simpler than the housing process in terms of spatial distribution. Of the sites submitted, these fell into three broad areas:
- ‘**at Bolney Grange**’
 - **Around A2300, Burgess Hill**
 - ‘**Other**’ i.e. spread throughout the district
- 8.4. Given the scale of employment development already planned at Burgess Hill within the District Plan, including the Science and Technology Park, it was deemed appropriate to spread additional growth across the district, to the extent that this was possible given the sites that had been promoted to the Council. This responds to the fact that the housing need of the district is also spread to the various towns and parishes, therefore enabling people to have the opportunity to live and work in the same area and to assist with a reduction in out-commuting. The Sustainability Appraisal [SUS1 and SUS3] assesses the relative merits of the three broad areas listed above and concluded that Bolney Grange and ‘Other’ were the most sustainable broad locations.
- 8.5. Following assessment against the criteria set out in Site Selection Paper 2 and consideration within the SA, 10⁶ sites were considered suitable for allocation as employment sites. Further information regarding the site selection process for the employment sites is set out in Site Selection Paper 4: Employment [SSP4].

Science and Technology Park

- 8.6. District Plan policy **DP1: Sustainable Economic Development** identifies a broad location for a Science and Technology Park to the west of Burgess Hill, to support research and development and provide high quality employment for the wider area. The principle of the allocation and location itself was based upon a range of documents which assessed deliverability, market demand, feasibility and suitability. The site should be capable of providing a minimum of 2,500 jobs.

⁶ 4 adjacent sites were combined to make 1 allocation, therefore only 7 sites are allocated in the DPD

- 8.7. Two specific sites have been promoted within the broad location to the west of Burgess Hill, essentially to the north and south of the A2300. Both sites were assessed against the employment criteria set out in Site Selection Paper 2 [SSP2]. The assessment results were published in Site Selection Paper 4: Employment [SSP4].
- 8.8. The conclusions of this assessment did not provide a clear distinction between the two sites; therefore the promoters were asked to provide further detailed information based on a series of 14 questions. The questions requested details of proposed uses, vision, access and highways, and how any on-site constraints could be addressed. This allowed a greater detail of analysis to be undertaken, with the conclusions clearly set out in Site Selection Paper 4: Employment.
- 8.9. Following assessment of the information provided for both sites, the site to the north of the A2300 has been concluded to be the preferable option, principally for highway reasons. The proposed access mitigation for the park to the north upgrades an existing junction on the A2300 and is shown to function more successfully than the access proposed by the site to the south which would involve the creation of a new junction on the A2300. Furthermore, the access solution proposed by the northern site is deliverable, within the land ownership of the site promoter. The northern site also benefits from better connectivity with the Northern Arc in pedestrian and cycle terms. It is proposed for allocation as policy SA9 within the Sites DPD.
- 8.10. Scrutiny Committee for Housing, Planning and Economic Growth (11.09.19) reviewed the material. Full Council (25.09.19) approved 7 employment sites and the Science and Technology Park for inclusion in the draft consultation Site Allocations Document.
- 8.11. It is important to note that the Science and Technology Park allocation is not allocated to meet an identified need (i.e. it does not contribute to the 25ha employment need identified in District Plan policy DP1 or the 10-15ha additional requirement set out in Sites DPD policy SA1). These requirements are met by existing allocations within the District Plan and policies SA2 – SA8 in the Sites DPD.
- 8.12. The Science and Technology Park allocation is an addition to these allocations – it is aspirational and reflects the District's ambitions for economic growth, building upon the aspirations of the Coast to Capital LEP and identification of this location in its Strategic Economic Plan (2014 and 2018). The Science and Technology Park is therefore beneficial to the wider region, rather than specifically meeting local needs.

Update following Regulation 18 Consultation Draft Site Allocations Document

Employment Sites – Additional Submissions

- 8.13. The Draft Site Allocation Document was subject to six weeks consultation between 9th October 2019 and 20th November 2019. A further six sites were promoted to the Council through representations made at Regulation 18 consultation. The new sites were assessed against the agreed criteria and set out the results of the assessment in a revised version of Site Selection Paper 4: Employment. They were also considered within the Sustainability Appraisal.
- 8.14. The six new sites were not considered suitable for allocation and no further sites were included in the Submission Draft version of the Site Allocations DPD.

Science and Technology Park – Transport

- 8.15. The District Council commissioned Systra to carry out a strategic transport assessment of the Sites DPD. More information on this can be found in section 9 of this Topic Paper.
- 8.16. At Regulation 18 stage, the Strategic Transport Assessment [T6] identified 2 junctions that were forecast to be 'severe' as a result of congestion from the proposed Science and Technology Park (SA9): these were the A23 / A2300 Southbound On-Slip, Burgess Hill and A272 / B2036, Ansty.
- 8.17. A revised Strategic Transport Assessment [T7] was prepared for the Regulation 19 Sites DPD. It identifies, and models, proposed mitigations related to the Science and Technology Park which consists of a widening to the A23 southbound to three lanes from A2300 Southbound Off-slip to B2118/Mill Lane Off-Slip. The model concludes that this mitigation would be successful in removing 'severe' impacts at the two locations above. Therefore, it can be demonstrated that there is, in principle, mitigation to resolve the issue.
- 8.18. A Transport and Mobility Working Group has been established, consisting of Mid Sussex District Council, West Sussex County Council, Highways England and the site promoter. The group has met on a regular basis to discuss mitigation in principle (both by sustainable measures and physical interventions), as well as detailed methodology and design for any subsequent mitigation. This has focussed on the level of detail required to support an allocation, and requirements for a planning application in due course, recognising the evidence required for an allocation should be 'proportionate' (NPPF para 31) and an application more detailed.
- 8.19. A Mobility Strategy has been prepared by the site promoter in collaboration with the working group, to set sustainable measures and interventions to reduce reliance on the private car and therefore reduce the impacts of the site on the A23/A2300 junction. The Mobility Strategy has been agreed by all parties.
- 8.20. In addition, further detailed design and modelling has been carried out to assess when (i.e. at which phase) physical mitigation is required, and the extent of it. The basis for this has been the in-principle agreement that the widening of the A23 southbound (above, as identified in [T7]) would resolve capacity issues related to the Sites DPD.
- 8.21. The work to agree detailed designs is progressing however a range of options have been identified. The working group has entered into a Statement of Common Ground [DC17] to agree the next steps for the mitigation strategy. The policy wording for SA9 was revised between Regulation 18 and 19 to provide caveats to ensure that development could only progress on the basis that there is sufficient highways capacity to do so, with agreement from the relevant bodies (Highways England and WSCC). The policy requires a phasing strategy, and other detailed transport evidence, to be submitted in support of any detailed planning application.

9. Evidence Base

- 9.1. The NPPF (para 31) requires policies to be underpinned by relevant and up-to-date evidence, which is adequate and proportionate to justify the policies concerned.
- 9.2. The District Plan sets the overall strategy and requirements for the district. This itself was based on a proportionate and robust evidence base to justify its content. The District Plan was adopted in 2018, therefore the evidence that supported it is still up-to-date and valid.
- 9.3. Specific evidence was obtained in order to inform the content of the Sites DPD. This focusses on evidence required to justify site selection (e.g Transport modelling and viability) as opposed to strategic matters which were dealt with in the District Plan.
- 9.4. The full evidence library is available online at www.midsussex.gov.uk/SitesDPD. Of particular note are three specific areas:
 - A Topic Paper setting out the Council’s assessment of sites within the AONB, to determine whether they are ‘major development’
 - Transport Modelling – to assess the impacts of the proposals on highways capacity and safety
 - Viability – to ensure the proposals are viable and capable of delivery

High Weald AONB

Evidence Base	
Library Reference	Title
TP1	High Weald AONB Topic Paper (December 2020)

- 9.5. Paragraph 172 of the National Planning Policy Framework (NPPF) affords great weight to conserving and enhancing Areas of Outstanding Natural Beauty. It states that “Planning permission should be refused for major development [in the AONB] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”. Footnote 55 states that “whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”
- 9.6. District Plan policy DP6: Settlement Hierarchy accepts that there is a residual housing need at settlements within the AONB, and this position was agreed by the District Plan Inspector. Growth is therefore expected at these settlements to ensure they thrive. The Council recognises the great weight placed on the AONB and has rejected all sites that were assessed as having High Impact against the AONB site selection criterion, based on information provided by the High Weald AONB Unit. A total of 2 employment and 6 housing sites were identified as having either low or moderate impact and when assessed through the Sustainability Appraisal performed well and were therefore proposed for allocation.
- 9.7. The High Weald AONB Topic Paper [TP1] provides an assessment to determine whether any of the proposed sites within the AONB could be defined as ‘major’. The Topic Paper has been prepared in close co-operation with the High Weald AONB Unit and Natural England.

- 9.8. One site proposed at Regulation 18 stage, SA25: Land West of Selsfield Road, Ardingly, was concluded to be "major development". However, as described in the Topic Paper, an alternative proposal was put forward which was re-assessed using the same methodology and concluded not to be major development.
- 9.9. The Topic Paper therefore concludes that, in the Council's assessment none of the sites within the Submission Sites DPD are classified as "major development" in the AONB.

Transport

Evidence Base	
Library Reference	Title
T1	Transport Model Validation Report (September 2018)
T2	Transport Assessment - Summary Note
T3	Scenario 1 Modelling Note (September 2019)
T4	Scenarios 2 and 3 Modelling Note (September 2019)
T5	Scenarios 4, 5 and 6 Modelling Note (September 2019)
T6	Scenario 7 and 8 Modelling Note (September 2019)
T7	Strategic Transport Assessment: Regulation 19 (March 2020)
T8	Strategic Transport Assessment: Non-Technical Summary (March 2020)
T9	Road Safety Review

- 9.10. Mid Sussex District Council appointed transport consultants to develop a new transport model for Mid Sussex to be used to determine the impact of the Site Allocations DPD on the capacity of the highway network. This work has been undertaken in partnership with West Sussex County Council as highways authority.
- 9.11. Throughout the plan making process various development scenarios have been tested through the transport model to enable consideration of the impact of development scenarios on the highway network. The Sites DPD Scenario [T7] represents the refined scenario of sites contained within the draft plan. The results of the transport modelling have also been used by the Council's air quality consultants who have used data from the transport model outcomes to undertake modelling of the predicted resultant changes in atmospheric pollutants, to inform the HRA.
- 9.12. In addition to the capacity assessment, a Road Safety Review has been undertaken which identifies a total of ten junctions in a 'safety priority list' (Table 2 T9). These junctions have been ordered by priority and safety mitigation is being developed at five of the junctions identified where there are currently no proposed safety improvement schemes; one of which is associated with the A23/A2300 Hickstead junction improvement work being undertaken by the site promoter.
- 9.13. At the time of the Regulation 19 consultation, work was ongoing in relation to the safety review as well as proposed mitigation and results of more detailed modelling at A23/A2300 Hickstead junction. As such West Sussex County Council Highway Authority issued a holding objection pending the outcome of this additional work. Work has continued to progress with the site promoter, Highways England, WSCC HA and Mid Sussex District Council regarding the impacts associated with the Science and Technology Park SA 9.

9.14. The work is yet to be fully concluded and as such a joint Statement of Common Ground (SoCG) [DC17] between the four parties has been signed which sets out the agreed position in transport terms relating to the proposed allocation SA 9. It is anticipated that it will be possible to reach an agreed position ahead of the Examination hearings.

Viability

Evidence Base	
Library Reference	Title
IV1	Infrastructure Delivery Plan (December 2020)
IV2	Viability Assessment Report (September 2019)
IV3	Additional Statement on Viability (November 2020)
IV4	Mid Sussex Whole Plan and Community Infrastructure Levy Viability Assessment (BNP Paribas, July 2016)

9.15. Mid Sussex District Council appointed viability consultants to consider the viability aspects of the deliverability of the 22 housing allocations in the Sites DPD and prepare a paper to set out their findings [IV2].

9.16. The review looked at the housing sites in the DPD and considered their deliverability having regard to the Council's existing viability assessment undertaken in support of the adopted Mid Sussex District Plan 2014-2031; Community Infrastructure Levy and District Plan Viability Study (BNP Paribas, July 2016) [IV4].

9.17. A set of additional appraisals were prepared for each of the 22 proposed allocations, prior to the Regulation 18 public consultation, based on the full 'policy on' scenario and the analysis was based on the assumptions set out in the district plan viability study [IV4].

9.18. The results show that the Residual Value exceeds the Benchmark Land Value by a substantial margin on most sites. Four exceptions to this are Sites; SA 14, SA 16, SA 32 and SA 33, which are on brownfield sites and some of which include flatted development; these sites are not shown as viable in this high-level assessment. It is important to note however that both brownfield and flatted developments are being delivered in the district and they are delivering affordable housing. In addition, these sites are being actively promoted which is an indication that the landowner/ developer anticipates it is economically viable to develop these sites. These sites are not being relied upon in the first five years of the plan and may require viability to be assessed at the detailed planning application stage.

9.19. The list of 22 proposed housing allocations remain unaltered in the Regulation 19 version of the Sites DPD. Following advice from the council's viability consultants (set out at IV3) and consideration of the representations received during the Regulation 19 consultation; further viability evidence was not required. The plan does not seek to introduce a new suite of policies that result in an additional financial burden on development nor does it seek to bring forward a range of sites that are notably different to those in the adopted district plan. Most development being approved and delivered under the district plan is policy compliant, which suggests the policy requirements are not preventing delivery of development.

Infrastructure Delivery Plan

- 9.20. An Infrastructure Delivery Plan (IDP) [IV1] has been prepared alongside the Sites DPD. It has been prepared to ensure that future growth will be supported by the necessary infrastructure. The IDP sets out for each site the infrastructure projects that will be required as a result of the development, alongside the estimated costs and funding mechanism.
- 9.21. Mid Sussex does not yet have Community Infrastructure Levy in place and therefore developer contributions to fund infrastructure will be sought through Section 106 planning obligations as well as direct provision by developers, West Sussex County Council / Town or Parish Councils and external sources of funding.

10. Sites DPD – Proposed Allocations

10.1. Following the Site Selection process and testing through the evidence base, the following allocations are proposed within the Sites DPD.

Employment Sites

Settlement Category	Settlement	Site Name	Policy Reference	Yield (ha)
Category 1 - Town	Burgess Hill	Burnside Centre, Victoria Road	SA2	0.96
		Site of Former KDG, Victoria Road	SA3	1.1
Category 2 – Larger Village (Local Service Centre)	Copthorne	Land north of the A264 at Junction 10 of M23	SA4	2.7
Category 3 - Medium Sized Settlement	Bolney (and part Hurstpierpoint and Sayers Common)	Land at Bolney Grange Business Park	SA5	7
	Bolney	Marylands Nursery, Cowfold Road	SA6	2.4
	Pease Pottage	Cedars, Brighton Road	SA7	2.3
		Pease Pottage Nurseries, Brighton Road	SA8	1
TOTAL				17.45

Table 11 - Proposed Allocations: Employment

10.2. The residual employment need is **10-15ha**. The sum total of proposed allocations represents an over-supply of **2.45 – 7.45ha**.

Science and Technology Park

10.3. The Science and Technology Park **North of the A2300, Burgess Hill**, is proposed for allocation. The site encompasses 50ha, and will accommodate a minimum of approximately 2,500 jobs.

Housing Sites

Settlement Category	Settlement	Site Name	Policy Reference	Yield
Category 1 - Town	Burgess Hill	Land South of 96 Folders Lane	SA12	40
		Land South of Folders Lane and East of Keymer Road	SA13	300
		Land South of Selby Close	SA14	12
		Land South of Southway	SA15	30
		St.Wilfrid's School	SA16	200
		Woodfield House, Isaacs Lane	SA17	30
	East Grinstead	Former East Grinstead Police Station	SA18	22
		Land South of Crawley Down Road	SA19	200

		Land South and West of Imberhorne Upper School	SA20	550
	Haywards Heath	Land at Rogers Farm, Fox Hill	SA21	25
Category 2 – Larger Village (Local Service Centre)	Crawley Down	Land North of Burleigh Lane	SA22	50
	Cuckfield	Land at Hanlye Lane East of Ardingly Road	SA23	55
	Hassocks	Land North of Shepherds Walk	SA24	N/A (130) ^a
Category 3 – Medium Sized Village	Ardingly	Land West of Selsfield Road	SA25	70
	Ashurst Wood	Land South of Hammerwood Road	SA26	12
	Handcross	Land at St. Martin Close (West)	SA27	30 (65) ^b
	Horsted Keynes	Land South of The Old Police House	SA28	25
		Land South of St. Stephens Church	SA29	30
	Sayers Common	Land to the North of Lyndon, Reeds Lane	SA30	35
	Scaynes Hill	Land to the rear of Rear of Firlands, Church Road	SA31	20
	Turners Hill	Withypitts Farm, Selsfield Road	SA32	16
Category 4 – Smaller Village	Ansty	Ansty Cross Garage	SA33	12
TOTAL				1,764

a – Planning permission has been granted on this site and it now as commitment as at 1st April 2020. Therefore, no yield counted here to avoid double counting, although the allocation is to be retained for 130 dwellings.

b – Slaugham Neighbourhood Plan is now made and Land St Martin Close (east) for 35 units is now a commitment as at 1st April 2020. Therefore only 30 units are counted here to avoid double counting.

Table 12 - Proposed Allocations: Housing

10.4. The residual housing need is 1,280. The sum total of proposed allocations represents an over-supply of **484 dwellings**.

11. Additional Policies

11.1. Whilst the primary purpose of the Sites DPD is to allocate sufficient housing and employment sites, the document also provides an opportunity for the Council to include a limited number of additional policies that are considered to be necessary to secure the delivery of sustainable development. The proposed policies are considered necessary to be complement with the District Plan and provide additional guidance or clarity. In the case of SA39: Air Quality, this policy replaces the relevant section of District Plan policy DP29: Noise, Air and Light Pollution as it is based on more up-to-date guidance.

11.2. The five additional policies proposed are summarised below.

Employment

11.3. Policy **SA34: Existing Employment Sites** supplements District Plan policy DP1: Sustainable Economic Development by providing additional protection for the District's existing employment sites. This is consistent with the Economic Development Strategy that was approved in 2018, which aims to increase and minimise the loss of employment floorspace. Whilst DP1 introduces the principle and provides high-level protection, SA34 provides additional clarity – firstly, it defines the boundaries of 'Existing Employment Sites' on the Policies Map; secondly, it provides criteria for supporting expansion outside defined built-up area boundaries.

Transport

11.4. **SA35: Safeguarding of land for Strategic Highway Improvements** has been developed in partnership with West Sussex County Council, who as Highways Authority has responsibility for delivering highway infrastructure across the district working in partnership with Highways England.

11.5. The policy seeks to ensure that land is safeguarded to support the delivery of strategic transport schemes identified by West Sussex County Council that will be necessary to support planned growth across the district, including development set out in the District Plan 2014-2031.

11.6. The identified schemes are listed below and are considered necessary irrespective of the growth proposed within the Sites DPD:

- A23/ A2300 Junction at Hickstead
- A264 Corridor upgrades at Copthorne Hotel Junction
- A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions

11.7. The areas to be safeguarded will be informed by more detailed design and feasibility work, to be carried out in consultation with West Sussex County council and other relevant parties.

Connectivity Improvements

11.8. **SA36: Wivelsfield Railway Station** and **SA37: Burgess Hill/Haywards Heath Multifunctional Network** have been developed to support the safeguarding of land for, and delivery of, transport schemes related to the Burgess Hill growth programme and aspirations within the Burgess Hill and Haywards Heath Neighbourhood Plans - in particular, the ambitious programme of sustainable transport improvements.

11.9. These relate to the expansion and upgrade of Wivelsfield Railway Station, to improve the efficient and effective operation of the station and increase the use of sustainable modes of travel and the Burgess Hill and Haywards Heath multifunctional network (for cycling, walking and equestrian). This network will promote road safety, reduce congestion and support healthy lifestyles. Policies SA36 and SA37 ensure that necessary land is safeguarded to ensure the delivery of these schemes are not prejudiced.

Air Quality

11.10. **SA38: Air Quality** replaces the sections of DP29: Noise, Air and Light Pollution that relate to air quality as set out in the District Plan and provides additional clarity on how proposals will be expected to address any air quality impacts. The policy is informed by and makes reference to the recently prepared Air Quality and Emissions Guidance for Sussex (2019)⁷ that has been prepared by the local authorities across Sussex, along with the County Council and a range of other stakeholders.

⁷ *Air Quality and Emissions Mitigation Guidance for Sussex Authorities.* (2019).

12. Updates since Regulation 19 Consultation

Minor Modifications

12.1. During the Regulation 19 consultation, a number of representations listed some minor modifications that would help to address their concerns. These were largely typographical, editorial or minor wording amendments. The Council has compiled a list of these [DPD2] and would be happy to agree them should they assist with the soundness of the Sites DPD.

Implications of changes to Use Class order

12.2. The employment forecast methodology set out in Site Selection Paper 4: Employment is based on the same methodology used during preparation of District Plan. As is customary for Economic Growth Assessments and identification of employment land requirements, the figures are expressed in terms of the Use Class order, namely:

- B1: Business/Light Industrial
- B2: General Industrial
- B8: Storage and Distribution

12.3. The Employment site allocations (SA1-SA8) within the Regulation 19 Sites DPD refer to the suitable use classes expected for each site.

12.4. Government announced revisions to the Use Class order, coming into effect from 1st September 2020. These revisions post-date Council approval and commencement of consultation on the Regulation 19 Sites DPD.

12.5. The removal of class B1, with Offices now in Class E will have implications for the Sites DPD. Simply swapping B1 for Class E within the policies may give rise to unintended consequences, whereby the allocations would be deemed acceptable for 'non-employment uses' with respect to those that form the basis of the employment forecasting.

12.6. As the employment requirement has been based on the anticipated forecasts in each of the three former use classes (B1/B2/B8) and these requirements need to be met (as opposed to being potentially 'lost' to other uses in Class E) it is suggested that a minor amendment is made to the Sites DPD employment allocations SA1 - SA8. This amendment will ensure that specific uses are referred to in the policy requirements (e.g. Office, Business, Light Industrial, General Industrial or Storage & Distribution) rather than by reference to the Use Class Order, to ensure that all forecasted need can be met.

Transport Assessment – Safety Study

12.7. The NPPF (para 109) states that development proposals should only be refused on highways grounds if there would be an unacceptable impact on highway safety. In their response to the Regulation 19 consultation, West Sussex County Council noted that this work was underway and that preliminary results were expected.

12.8. The Safety Study work has progressed significantly since Regulation 19. Preliminary results [T9] noted that there are 10 junctions on the network that should be investigated further. Of these, 5 have identified mitigation schemes in place and one high priority junction is being redesigned by the site promoters for the Science and Technology Park (SA9) and includes safety improvements; meaning only the

remaining 4 may require mitigating as a result of the Sites DPD. Only one of these is classified as 'high priority'. Note that none are in immediate proximity to any proposed Sites DPD sites and it is likely that a combination of one or more sites may be contributing to any potential impact.

Junction	Priority
B2028 Turners Hill Road / Wallage Lane	High
B2115 / A23 Southbound	Medium
B2110 Brooklands Way / Firbank Way / Railway Approach E.G	Medium
B2036 London Road / Victoria Way Burgess Hill	Low

Table 13 - Safety Audit Junction Priority

- 12.9. The Council's transport consultants, Systra, has undertaken a review of each of the junctions and accident data to identify the extent of mitigation required. Concept mitigation proposals have been discussed and agreed in principle with West Sussex County Council.
- 12.10. Detailed designs have been produced on this basis for the remaining high priority junction. High-level junction mitigation is being developed for the 2 medium and single low priority junction (this approach has been agreed by the County Council). The types of mitigation discussed and agreed in principle are all within the highway boundary, are minimal in nature (e.g. additional signposting or lane markings) with no barriers to delivery (such as requiring third party land, or significant physical highway interventions or infrastructure). High-level cost estimates have been prepared for each of the 4 designs and apportionment analysis of the mitigation costs will be provided once confirmed.

13. Conclusion

- 13.1. This paper provides a clear picture of the work that the Council has undertaken to prepare the Sites DPD. It also sets out the evidence that demonstrates that the Sites DPD is a sound plan and meets all the tests of soundness.
- 13.2. The Site Selection Process has been transparent, open and robust. Each stage has been subject to close scrutiny by officers, Members and stakeholders such as the development industry and statutory consultees. Findings from each stage have been reported publicly to demonstrate robustness in the process and decision making.
- 13.3. The Sites DPD has been subject to two rounds of formal consultation which has allowed all stakeholders, particularly local communities, to have their say. Amendments have been made between Regulation 18 and 19 to address concerns raised and to improve the Sites DPD.
- 13.4. The Sites DPD has been prepared in accordance with the NPPF, PPG and best practice. The site selection process and the proposed allocations reflect the District Plan strategy. It meets the aim of allocating sufficient sites to meet residual needs for housing and employment – in both instances providing an over-supply in order to provide flexibility and resilience in supply.
- 13.5. Upon adoption, the Council will be able to demonstrate that its entire plan requirement has been met. The sites within the Sites DPD will make a valuable contribution towards the overall plan requirement as well as ensuring the Council can maintain a five-year housing land supply.