

Response to Site Selection Methodology Review (MS-12)

- 1 This focused note, prepared by SLR Consulting on behalf of Miller Homes, provides our comments on the Response to Site Selection Methodology Review (MS-12) – hereafter the ‘SSMR’. It should be read alongside our previous hearing statements, particularly statements on matters 5 and 6.
- 2 Miller Homes applauds MSDC for accepting that a higher housing requirement should be targeted and agrees with the need to review sites previously rejected with the aim of delivering more homes. The SSMR references a target requirement of between 1,200 and 1,300. The Inspector indicated during the matter 2 hearing that the upper end of this range should be the Council’s aspiration and Miller Homes agree with this given the considerable unmet needs arising from Crawley and the southern HMA.
- 3 Approaching the review with a clear target in mind means the review of sites must be considered through the prism of paragraph 11(b) of the September 2023 NPPF. This means that when considering sites, they should only be discounted where the harms significantly and demonstrably outweigh the benefits.
- 4 The note acknowledges that the Council will reappraise sites submitted via the SHELAA at every stage, and this is supported. It is our view that the initial focus of search should be those sites that reached the 3rd stage of assessment, given they were the sites originally considered the least constrained.
- 5 Moving onto the specifics of the assessment, in general, the approach put forward to the review is supported; however, there are a number of considerations, most of which were raised in discussions at the Matter 5 and 6 hearing sessions, that have been omitted from the note, which we consider should be included or given more weight.

Delivery Trajectory

- 6 It is apparent from the matter 1 and 2 hearing sessions that MSDC will have a higher requirement in the early years of the plan period than is currently drafted in the submission plan. Doubt has also been cast on the stepped trajectory proposed by the Council, and we remain concerned about its application (see hearing statement 2). In any case, there is an acknowledgement that the housing requirement must be higher, and that there are unmet housing needs now. This will put pressure on the 5YHLS at the time of plan adoption.
- 7 In considering the inclusion of sites for allocation, additional weight should therefore be given to sites that can deliver quickly and within the first five years of the plan. This appears to be absent from the SSMR and must be included in our opinion. Sites relying on/co-located with new strategic allocations will be at a disadvantage, where they will be reliant on the new community facilities etc being provided, against settlements where this is already established.

Draft NPPF

- 8 The government have published a draft NPPF. Based on the draft transition arrangements, most of the policies within it will come into effect on adoption. Whilst the plan is being examined against the September 2023 NPPF, it is in our view important that in reviewing sites, regard is had to the aspirations of the draft NPPF, which will have a bearing on decisions once published in its final form, which is likely to be before this plan is adopted. In particular, NPPF policy S5(j) is of relevance, which focuses development to existing settlements in the event that a 5YHLS cannot be demonstrated, specifically, development

well related to a development. As such, the SSMR should be updated to positively support sites next/near to the boundary of a higher tier settlement.

Relative Accessibility Standards

- 9 We recognise and support the SSMR paragraph 10, second bullet relating to the contribution that well-located development can make to supporting local services. However, we do not consider that this goes far enough.
- 10 The previous Site Selection Methodology applies the same criteria for accessibility across the district. During the Matter 6 hearing session, the point was made that this is too blunt an approach to considering accessibility, particularly with regard to existing higher-tier settlements.
- 11 The range of facilities in existing tier 1 settlements, like Haywards Heath, results in a stronger 'draw' from the local areas which increases the distance local residents are willing make trips by foot and cycle, particularly when they benefit from a well-connected train station. On the other hand, residents of lower-tier settlements, or a new settlement, will most likely still need to drive to higher-tier settlements to meet their employment or weekly needs. New strategic allocations may be able to provide facilities to meet day-to-day needs (school, convenience store, etc), but they are not likely to provide the diversity of employment and facilities that a higher-tier settlement already provides.
- 12 This should be reflected in the criteria 10 and 11 assessments when MSDC come to assess sites by providing a more generous accessibility criterion for developments on the edge of higher tier settlements.

Employment

- 13 Linked to the above, in assessing sites, consideration should also be given to a site's proximity to employment opportunities. Travel to work remains the main and most regular reason for travel and hence locating homes where opportunities to travel to work by sustainable means is an important driver in delivering more sustainable patterns of growth across the district. The latest National Travel Survey Dataset¹ indicates that the average commute distance to employment by walking is 1,352m and by cycling is 5,498m.
- 14 Consideration of accessibility to employment also needs to take account of all forms of employment, not just traditional offices or business parks. For example, the Princess Royal Hospital is a major employer in the district and within Haywards Heath, providing key services to the district population. Co-locating housing, including affordable housing potentially accessible to key workers, close to such employers can enable sustainable travel patterns whilst also improving hospital outcomes by increasing the local pool of workers.
- 15 Providing housing near employers of all types, and particularly those performing a critical local or district function, should be given weight in the appraisal of sites for allocation, given the multiple positive economic, social and environmental benefits co-location can provide.

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¹ **NTS0412** - <https://www.gov.uk/government/statistical-data-sets/nts04-purpose-of-trips>