



Comments on Site Selection Methodology

JOB NUMBER

35569

CLIENT

Option Two Development Ltd

SUBJECT

Mid Sussex Local Plan Examination

Comments on MS-12: Post Hearings - Site Selection Methodology Review

DATE

March 2026

1 Introduction

We welcome the publication of MS-12: Post Hearing Site Selection Review Methodology ("MS-12") and support its overall purpose: to set out a clear methodology for re-appraising SHELAA sites in response to the Inspector's preliminary feedback and the need to identify additional sites to test an increased housing requirement. In particular, we support MS-12's stated intentions to (i) review sites irrespective of the stage at which they were previously rejected, (ii) re-consider whether impacts/constraints can be mitigated, (iii) apply a more positive approach to planning within the overall planning balance, and (iv) clearly document the rationale for decisions (including how NPPF paragraph 11(b) has been applied).

Our comments below are strictly limited to the methodology. They are intended to strengthen MS-12 as a transparent, proportionate and auditable process that enables fair consideration of: (a) sites that are in sustainable locations but do not adjoin a defined built-up area boundary, and (b) sites where constraints exist but are capable of mitigation.

2 Stage 2(a) Re-appraisal

Paragraph 7 of MS-12 confirms that sites previously discounted at Stage 2(a) will be re-appraised to determine whether other allocations in the Plan or emerging or proposed allocations in the plans of neighbouring authorities materially change the basis on which sites were discounted.

Paragraph 23 of the original Site Selection Methodology (Oct 2023) stated that Stage 2(a) is intended to exclude sites that will not contribute to a sustainable pattern of development. This would be undertaken through an assessment as to the degree of separation from an existing built-up area boundary as defined on the policies maps.

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To ensure the Stage 2(a) reappraisal operates as a true sustainability assessment, the re-appraisal should not be limited to a consideration of the distance from a built-up area boundary alone. There are numerous examples of areas of Mid Sussex which are built up to the extent that they are perceived to be part of a settlement even though they fall outside the built-up area boundary as drawn on the policies map.

As well as considering intervening planned allocations, account should be taken of the overall sustainability characteristics of the site being considered. The reappraisal should consider the functional relationship of a site to an existing settlement or planned extension and take into account proximity to existing built form, access to services/employment, and public transport accessibility, and not boundary position alone. This reduce the risk of premature screening-out of sustainable locations that warrant progression to Stage 2(b)/(c) for fuller assessment.

The penultimate bullet point of section 7 should be updated to state:

Re-appraise the sites previously discounted at Stage 2(a) to determine whether other allocations in the Plan or emerging or proposed allocations in the plans of neighbouring authorities materially change the basis on which sites were discounted. Account should be taken of the overall sustainability characteristics of the site including consideration of proximity to existing built form, access to services/employment, and public transport accessibility, not just the proximity to a Built Up Area Boundary alone.

3 Stage 2(c) Re-appraisal

Sites which reach Stage 2(c) must be properly assessed to ensure that the potential to mitigate identified impacts is properly taken into account. We are concerned that numerous sites were previously discounted due to the presence of constraints where there was a reasonable prospect of those constraints being addressed through appropriate mitigation.

It is unusual for sites to be completely unconstrained, and therefore a failure to properly consider the potential for suitable mitigation means that several sites were screened out at Stage 2(c) unnecessarily.

The first part of section 9 of MS-12 should be updated to state:

In accordance with Stage 2(c) of the Site Selection Methodology, all sites will be re-appraised having regard to the above, and taking into account whether there is a reasonable prospect that appropriate mitigation can be put in place to address any constraints and/or adverse impacts identified.