

MS-14: Review of Responses to MS-12 – Site Selection Methodology Review

March 2026



MS-14 MSDC Review of Responses to MS-12 Site Selection Methodology Review

Respondent	Summary of comments	MSDC Response
<p>High Weald Joint Advisory Committee</p>	<ul style="list-style-type: none"> • NPPF allows for Local Plans to provide for less than the housing need in certain circumstances (NPPF para 69 and 11b (i)). ‘Great weight’ should be given to conserving and enhancing landscape and scenic beauty of NL. ‘Scale and extent of development within designated areas should be limited. Meeting OAN should be in context of the limited scale and extent of development in NL as required by NPPF • HWAONB management plan material consideration. • HWNL unit technical specialist (para 7) • Expect assessment of any site in/setting NL predicated on NPPF requirement to give great weight to conserving and enhancing landscape, supported by detailed assessment • Para 8 – steps outlined should be informed by site assessment requirements • Para 8 second bullet concerned – benefits – NPPF 11b i is an absolute test not a weighted one • Para 9 final bullet – expanded to include reference to conservation, enhancement of natural, built and historic environment. Reflecting NPPF para 20(d) • Para 10 expand list of social and economic benefits/ local priorities to include 	<ul style="list-style-type: none"> • Inspector has confirmed that notwithstanding the constraints of the District, the Council should test its ability to meet a higher housing requirement. • Noted regarding management plan – this will inform our assessment of impacts on the HWNL. • Yes, the HWNL Unit will be considered one of the technical specialists. We can amend the text to the clarify this point should the Inspector consider this is necessary. • We will work with the JAC to develop a proportionate approach to assessing sites within the HWNL, having regard to the comments provided. We would welcome any guidance from the Inspector on what type and level of assessment he considers to be necessary to support the re-appraisal of sites. • See response to bullet above. • We propose to amend the text at para 8 second bullet to ensure the policy test we will apply more aligns more fully with NPPF requirements. • We propose to amend para 9 final bullet to include the suggested text. • We propose to amend para 10 to include the suggested text.

Respondent	Summary of comments	MSDC Response
	<p>conservation and enhancement of protected landscape.</p>	
<p>Tim Higginson - WILD</p>	<ul style="list-style-type: none"> • Para 6/7 - timescales disadvantage smaller developers. • Para 7 – re appraise original assessments • Para 7 - Giving equal weight to principle 3 and 4 would require change in spatial strategy. May result in significant sites being favoured, at odds with characteristics of district. • Para 10 – be specific where unmet need lies to provide context for site selection choices. 	<ul style="list-style-type: none"> • Sites have already been submitted to the Council. This exercise shouldn't result in additional new work being required, just update to what has been submitted already, if required. Should any developer require a few more days to provide the updated information we will be flexible in this regard to ensure no party is disadvantaged. • We will be updating the assessments against the criteria in Appendix 1 where there is new information (arising from the evidence base or updated information from promoters). We will be re-visiting the conclusions for all sites to accord with the updated methodology – this is an extensive exercise. • Inspector has advised that principle 3 and 4 should be considered equally as part of the spatial strategy. This approach will not result in a change to the strategy. • Propose to amend para 10 to be more specific to refer to where unmet need arises – consistent with requests from other submissions.
<p>DHA – Catesby – Mark Bewsey</p>	<ul style="list-style-type: none"> • Equal weight to principles, rather than cascade. This approach seems to imply that most sustainable settlements will not be looked at first. • The most sustainable locations must be considered first. • Seek clarification that all previously discounted sites will be reconsidered 	<ul style="list-style-type: none"> • Inspector has advised that principle 3 and 4 should be considered equally as part of the spatial strategy. • Growth at sustainable settlements will continue to form an important part of the strategy. Propose to amend para 7 to reflect amends from other submissions. • Propose to amend paras 7 and 8 to make it clearer that the Council is re-visiting all sites at Stages 2(a) and 2(b) and determining whether they should progress to Stage 2(c). Criteria assessment will be updated (undertaken at Stage 2(b) will be updated where there is new information (arising from the evidence base or updated information from promoters). Justification for sites at Stage 2(c) will be re-visited for all in accordance with updated criteria assessment and wider factors identified.

Respondent	Summary of comments	MSDC Response
DHA – Option Two Development – Jonathan Buckwell	<ul style="list-style-type: none"> • To ensure Stage 2(a) reappraisal operates as a true sustainability assessment, it should not be limited to a consideration of the distance from Built up area. Suggested amended wording for Section 7. • Section 9 should be updated to state where there is a reasonable prospect of constraints being addressed through appropriate mitigation to avoid sites unnecessarily being ruled out 	<ul style="list-style-type: none"> • Built up area boundaries defined to maintain separate identify of settlement, prevent urban sprawl into the countryside. This forms an important part of the District Plan strategy and the strategic objectives of the plan. On reflection and having regard to the Inspector’s request to consider positive planning, we consider there would be merit in a broader review of sites discounted at Stage 2(a) which extends beyond that proposed at para 7 and para 23 of Site Selection Methodology (SPP1). This would ensure that combinations of sites could be appraised together, whilst ensuring that isolated small sites in unsustainable locations are still discounted from the site assessment process. • Propose to amend Section 9 to reflect the drafting proposed by DHA.
SLR – Miller Homes - Andrew Munton	<ul style="list-style-type: none"> • Should look at sites discounted at 3rd stage first as least constrained. • Concern about application of stepped trajectory. Additional weight given to sites that can deliver quickly/ in first 5yrs • Role of NPPF s5(j) – focuses development to existing settlements. Update SSMR to positively support sites/ next to near boundary of higher tier settlement. • Para 10 – accessibility criteria too blunt. Access to services should be reflect range of facilities at tier 1/ give more generous accessibility criteria for tier 1 settlements. • Proximity to employment should be given weight 	<ul style="list-style-type: none"> • Para 7 and 8 explain that all sites assessment will be reviewed, irrespective what stage reached. Could make an amendment to address this point – since these are less constrained sites. However, in the wider balance other sites may make a more positive contribution overall. Would welcome the Inspector’s guidance on this matter. • The Council has asked promoters for information on anticipated delivery rates. This will inform the Council’s revised Trajectory for the Plan. The availability of sites, the final housing requirement, windfall allowance and headroom figure will also inform the Council decision on if stepped requirement is needed. Whilst the Council is required to demonstrate a 5 year supply of housing on adoption, it also needs to be able to demonstrate a consistent supply of housing over the whole plan period. Propose to amend para 11 to make it clearer that regard will be had to those sites where they can bolster the Council’s 5YHLS. • Propose to amend para 9 sub-bullet 2 to strengthen that sites next/near to the boundary of a higher tier settlement will be given significant weight. • We consider that criteria 10 and 11 provide a robust means for assessing the accessibility of sites to services. Consideration to the range and scale of services and therefore the relative weight to give to these criteria should be

Respondent	Summary of comments	MSDC Response
		<p>addressed as part of the planning balance. Therefore, we do not propose to amend the scoring for the criteria.</p> <ul style="list-style-type: none"> • We are minded to add an additional criterion to Appendix 1 of the SSM which relates to proximity to employment using the designated/ringed sites discussed in week 1 of the hearings as a proxy for this.
<p>Lucid planning – Crest – Adrian Barker</p>	<ul style="list-style-type: none"> • Bullet 4 – at odd with hearing and suggestion that Inspector indicated principles 3 and 4 be out on even footing. Inspector appeared to support cascade approach. • Cat 1 settlement should be favoured over a settlement requiring substantial support for infrastructure at a lower tier settlement • NPPF and support for active travel/ proximity to railway stations. • Para 10, Bullet 1- additional sites should fall in relevant HMA • Housing in proximity to employment including outside of the District. • More detail on broad approach to weighting to be applied to provide certainty and confidence. • Targeted dialogue would be beneficial – discuss prior to site’s being ruled out, to enable concerns to be addressed • Difficult to see where the level of granular information will come from • Lack of information on the suite of extended issues to be considered. • Should try to find ways site can be designed to work with mitigation. 	<ul style="list-style-type: none"> • Inspector has advised that principle 3 and 4 should be considered equally as part of the spatial strategy. Growth at sustainable settlements will continue to form an important part of the strategy. • Amends proposed in response to Miller Homes rep will address this point. • Unclear what, if any, specific amends are being requested. However, significant weight will be given to the access to services, public transport and employment locations as per para 10, bullet 2. • Propose to amend para 10 to be more specific to refer to where unmet need arises – consistent with requests from other submissions. • Subject to the Inspector’s views, proposing new criterion which will assess proximity to employment locations within the District. Welcome the Inspector’s views on whether anything further is required regarding employment locations outside the District; this could be picked up in the overall assessment at Stage 2(c) in terms of the planning balance? • Our preliminary view is that it would be difficult to provide this framework given the range of different factors being considered. We would welcome the Inspector’s view on this point – and if he considers something more is needed what this could comprise. • Para 14 explains that site promoters will have the opportunity to fact check the site assessment proformas once available. This will be a more efficient use of the Council officer time than individual meetings whilst still providing site promoters the opportunity to make comment on the Councils assessment, before sites are subject to further testing. • The granular assessment will come from updated information from developers/site promoters/Council’s evidence base plus a more detailed

Respondent	Summary of comments	MSDC Response
		<p>explanation of why sites are not considered suitable for development, using the conclusion of the site specific assessment.</p> <ul style="list-style-type: none"> • Propose this comment is addressed through amends proposed in response to Riverdale rep which picks up a similar point. • This matter is sufficiently addressed in the methodology. Should the Inspector consider something further is required we would welcome his guidance on this.
Thakeham – Chris Brake	<ul style="list-style-type: none"> • Para 4, bullet 2 – sites close to /adjacent to existing settlement, sustainable locations, but in NL. Inspector highlighted might be sites that perform strongly but ruled out due to landscape • Para 7 bullet 3 – will MSDC accept and endorse submissions by promoter. Will MSDC allow promoter to review assessment and allow comments to avoid dispute. • Para 15 – agree with in-combination assessment. Helpful to understand the timing for this. • Para 15 - Promoters could support MSDC with assessments. 	<ul style="list-style-type: none"> • Para 8 explains that sites previously rejected at Stage 2(b) will be reviewed. This includes sites that were previously excluded due to the impact on the HWNL. This review will include looking at the benefits that could potentially arise from the development, to ensure consistency with NPPF 11(b). Propose to amend para 8 to make specific reference to re-looking at sites in the NL. • Para 7 bullet 3 is clear that the Council will use the updated information to inform its assessment – not that it will accept and endorse it. Where the Council arrives at a different view to the promoter, as far as is reasonably practicable the reasons for this will be written up as part of the site assessment. • We would welcome guidance from the Inspector as to whether the Council needs to formally submit a programme for sharing with all participants. • Para 14 explains that site promoters will have the opportunity to fact checking the site assessment proformas once available. This will be a more efficient use of the Council officer time than individual meetings whilst still providing site promoters the opportunity to make comment on the Councils assessment, before sites are subject to further testing. It will not be possible for promoters to assist with in-combination assessments.
DMH Stallard – Riverdale – Tondra Thom	<ul style="list-style-type: none"> • Lack of structured framework for assessing collective benefits in practice, assessing how sites contribute to collective benefits at a settlement level. 	<ul style="list-style-type: none"> • The Council has set out the issues that it will look at for considering the collective benefits at para 9. This could be bolstered to reflect the additional matters identified. We would welcome guidance from the Inspector on this matter.

Respondent	Summary of comments	MSDC Response
	<ul style="list-style-type: none"> Inspector directed that principles 3 and 4 carry equal weight and not be applied as a cascade. Methodology retained sequential staging. Stage 2(a) operates as a preliminary filter can be ruled out before principle 4 assessed. Should embed principle 4 considerations at stage 2(a). 	<ul style="list-style-type: none"> See our response to DHA on behalf of Option Two – proposed amends would address this comment.
Elliott Fielding	<ul style="list-style-type: none"> Should re-examine showstopper constraints – relating to Conservation Areas. e.g. Staplefield as preventing meeting housing need Sites rejected at stage 2(a) should be reviewed to match needs in sustainable locations. Built up area boundary not a marker of sustainability. Should review all sites in/adjacent to villages not just those rejected at 2b. Settlement hierarchy does not match level of services. Services not being supported by sustainable development. Settlement hierarchy has not been reviewed to reflect increase in homeworking/access to employment locations via sustainable transport. Ignored place smaller villages have, not just reliant on large towns for services Take a more granular approach to meeting unmet needs, which responds to where the need arises. 	<ul style="list-style-type: none"> Para 8 explains that ‘showstopper’ constraints will be re-assessed. This will include any sites rejected on the basis on substantial harm on a Conservation Area, where this was the sole reason for a site being rejected. Built up area boundaries have been defined to maintain separate identify of settlements, prevent urban sprawl into the countryside. This forms an important part of the District Plan strategy and the strategic objectives of the plan. Staplefield is a Category 4 settlement and does not benefit from a BUAB given the dispersed form of the village. The Council continues to believe that such locations do not represent sustainable locations for development and therefore such sites should be excluded from consideration at Stage 2(a). See response to our previous bullet point as well as our response to Catesby. The settlement hierarchy is well established and evidence base assessment (ENV16). The level of services is not the sole indicator of where a settlement lies in the settlement hierarchy. Accessibility including public transport to employment services and facilities; and opportunities to gain local employment are also taken into account. Environmental considerations including National Landscape already taken into account. See response to Crest regarding proposed new employment criterion. Sites in all settlements which have a BUAB have been considered through Stages 2(b) onwards of the site selection process. As per the published methodology and clarifications set out above, we will re-assess all relevant sites over the coming weeks. For settlements which do not have a BUAB,

Respondent	Summary of comments	MSDC Response
		<p>then development to meet local needs can come through as rural exception sites.</p> <ul style="list-style-type: none">• See response to WILD regarding proposed amendments regarding unmet needs.