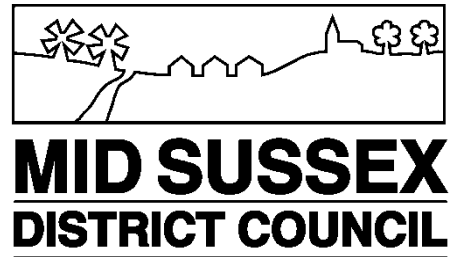


**Mid Sussex  
District Council**



# **District Plan Review: Site Selection Methodology**

October 2023

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# District Plan Review: Site Selection Methodology

## Introduction

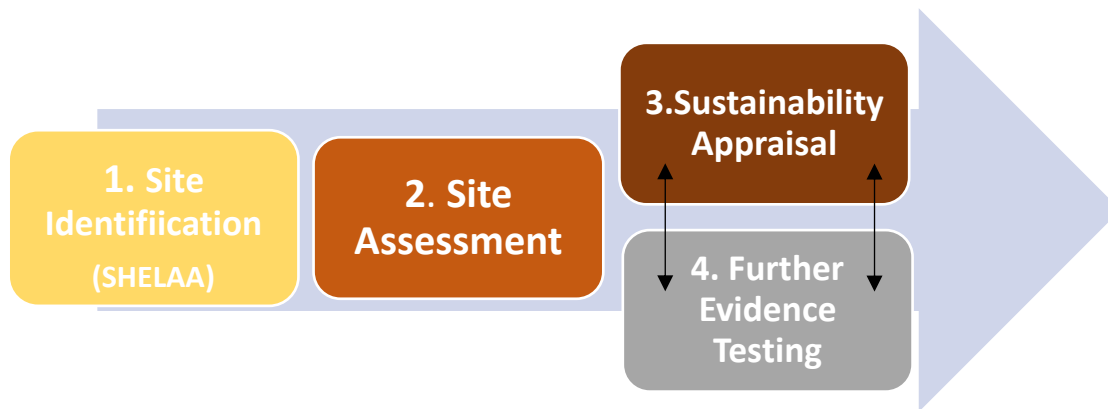
1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. In line with the requirements of the planning regulations and the National Planning Policy Framework (NPPF), as well as the commitment set out in District Plan Policy DP4, Mid Sussex District Council (Council) is preparing a revised District Plan. It will determine the overall strategy for future development across the District to 2039 including the location of residential development to address housing need.
2. The Site Selection Methodology has been developed to enable a robust and transparent site assessment process, which will inform decisions the Council makes on future District Plan strategy and site allocations.

## Purpose of the Paper

3. The purpose of this paper is to explain the methodology that will be followed to develop a shortlist of potential housing sites that could be allocated in the Revised District Plan. The final decisions on which sites will be allocated in the Revised District Plan will be informed by other evidence documents such as Sustainability Appraisal and Habitat Regulation Assessment.
4. NPPF paragraph 11 a) states “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;” Therefore, this methodology will be applied to the assessment of all housing types including specialist accommodation for older people, self and custom build and Gypsy and Traveller accommodation. All housing should be provided in sustainable locations, well located to existing settlements or form part of new ‘stand-alone’ settlements, to support the delivery of sustainable communities.

## Site Selection Process – Overview

5. The process of selection sites for allocation in the District Plan is a 4-step process as set out below:



6. The site selection process has been developed in order to determine the most sustainable and developable sites in accordance with the NPPF, which will ensure that the site selection is consistent with the principles of sustainable development and consistent with the policies within the Framework (NPPF, Chapter 2).
7. This paper explains the steps that will be undertaken at each stage.
8. The overall Site Selection Methodology has been subject to a focussed consultation with neighbouring local authorities and the Council's Developer Liaison Group which is formed of representatives from across the development industry. Comments received and the Council's response to these comments can be found in Appendix 3.

## Stage 1: Site Identification - SHELAA

9. The initial step has been to identify the pool of sites for consideration and assessment. The NPPF requires all local authorities to prepare a Strategic Housing Land Availability Assessment (SHELAA), to enable them to have a clear understanding of the land available in their area.
10. The Council prepared an updated SHELAA (April 2020) to support the preparation of the Site Allocations DPD. It included a review of the methodology to ensure that the new SHELAA is robust and complies with the most recent Government Guidance reflecting best practice. The methodology was prepared in consultation with a Member Working Group, representatives from the development industry, other Local Authorities and Town and Parish Councils. The methodology does not depart from that set out in the NPPF; it remains robust and reflects latest guidance, therefore a review of the methodology is not required at this stage.
11. The full detailed SHELAA methodology is available to view on the website at [www.midsussex.gov.uk/SHELAA](http://www.midsussex.gov.uk/SHELAA).
12. The latest 2023 SHELAA includes:
  - Sites included in the 2020 SHELAA that supported the preparation of the Site Allocations DPD;
  - Sites submitted during the two rounds of consultation on the Site Allocations DPD;
  - The Call for Sites that the Council held between 7<sup>th</sup> January and 19<sup>th</sup> February 2021;
  - Sites that came forward following the call for sites up until an agreed date that allowed sufficient time for the site to be assessed and included within the next the SHELAA update; and
  - Sites submitted to the Mid Sussex District Plan Consultation Draft (2021-2039) (Regulation 18) consultation undertaken between 7<sup>th</sup> November to 19<sup>th</sup> December 2022.
13. The 2023 SHELAA includes approximately 272 housing sites. These sites form the pool of sites for the preparation of the District Plan Review and subject to the Site Selection Process outlined at Stages 2 – 4 below.
14. The SHELAA contains sites with a yield of 5+ dwellings, there is no upper limit for consideration for allocation within the District Plan Review. For the purposes of the Site Selection process, sites have been classified into the following categories (as different considerations are made for 'Significant' sites during the process).

Classification	Approximate Yield
Small Scale	5 - 49
Medium Scale	50 - 299
Large Scale	300 - 999
Significant	1,000+

## Stage 2: Site Selection

15. The SHELAA 2023 (Stage 1) provides the pool of sites, from which specific deliverable and developable sites will be identified and allocated through the Plan making process.

16. Stage 2 of the process is the detailed assessment of sites. This includes three steps by which sites can be rejected resulting in a final shortlist of sites for further testing at Stage 3. This will ensure that only the most suitable, sustainable and deliverable sites are proposed for allocation. The site selection process broadly follows that adopted for the Site Allocations DPD, which the Council considers to be robust and transparent and has been tested at the Site Allocations DPD Examination.

### Outputs from the Stage 2 Assessment Process

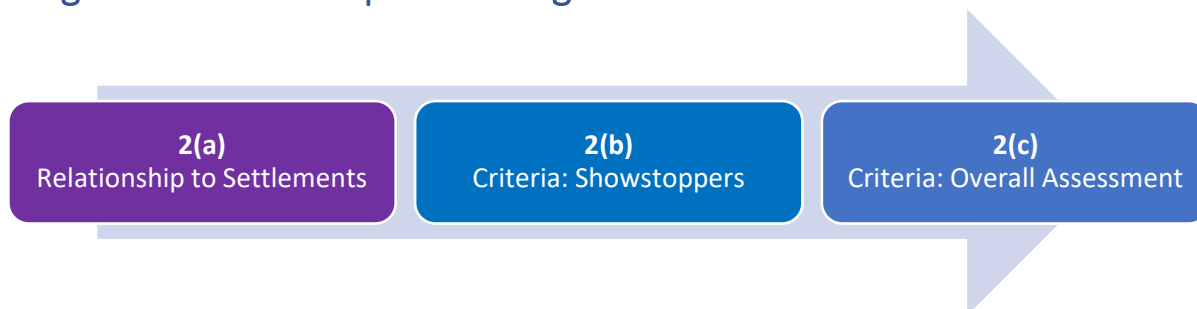


17. Stage 2(a) will assess the relationship of the site to existing settlements. Sites that are disconnected from existing settlements, that cannot provide significant on-site facilities/services (and are therefore not likely to represent sustainable development as set out in the NPPF) will be rejected at this first stage.

### Assessment against Site Selection Criteria – Stages 2(b) and 2(c)

18. A set of selection criteria have been developed in order to determine the most sustainable and developable sites in accordance with the NPPF, which will ensure that the site selection is consistent with the principles of sustainable development and consistent with the policies within the Framework (NPPF, Chapter 2).
19. The Selection Criteria are set out in **Appendix 1**. Sites classified as “Significant” (1,000+ dwellings) will also be subject to additional scrutiny in light of the additional information gathered from the focussed questionnaires, as set out in **Appendix 2**. Because of the more challenging nature of delivering larger scaled sites, due to their infrastructure requirements, constraints, on-site provision of facilities and services, land assembly/ delivery mechanisms, and likely phasing (including potential continued development beyond the plan period), additional considerations and due diligence are required. Similar questionnaires were sent to the other “Non-significant” sites for consistency and to ensure that the Council has the most up-to-date information.

## Stage 2a: Relationship to Existing Settlements



20. The NPPF states that Plans should apply a presumption in favour of sustainable development “all plans should promote a sustainable pattern of development” (NPPF, paragraph 11) and “be prepared with the objective of contributing to the achievement of sustainable development and “be prepared positively, in a way that is aspirational but deliverable” (NPPF, para 16). It goes on to state that “Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability” (NPPF, para 68).
21. In order for development to be considered to be sustainable it needs to be supported by the appropriate infrastructure and services, such as shops, places of employment and education, which are generally found within the Towns and Villages of Mid Sussex. For development to be sustainable it should also seek to protect and enhance the natural environment. Development that is isolated and disconnected from existing settlements is unlikely to contribute towards a sustainable pattern of development.
22. A distinction is made during the assessment process between ‘Significant’ sites (capable of delivering 1,000 homes or more) and other sites, as sites of significant scale can act as ‘stand-alone’ settlements supported by on-site infrastructure and services which could enable them to be self-sufficient and deliver sustainable places. All ‘Significant’ sites progress directly to Stage 2(b).
23. Stage 2(a) of the process is to exclude those sites that will not contribute to a sustainable pattern of development. An assessment will be made as to the degree of separation from an existing built-up area boundary (as defined on the Policies Maps). This assessment will be based on the consideration of:
  - proximity of site to defined built up area boundary;
  - physical separation of site from existing built-up area by features such as ancient woodland and watercourses;
  - ability to safely access the site, on foot via existing footpath from nearest settlement
24. The sites rejected at this stage will not be subject to assessment against the selection criteria at Stages 2(b) and 2(c) as they do not represent sustainable development.

## Stages 2(b) and 2(c) – Assessment against Site Selection Criteria

25. All sites progressing from Stage 2(a) will be assessed against the full Site Selection Criteria.
26. The criteria include relevant land designations, constraints, access to services, infrastructure and transport. The methodology has been developed to provide a clear framework to assess each housing site on a consistent basis to develop a shortlist of the most suitable and sustainable sites for inclusion in the District Plan.
27. There are 14 criteria which each housing site will be assessed against, split into three parts:
  - Environmental Constraints
  - Deliverability
  - Accessibility
28. The impact on each criterion is graded using a ‘traffic light’ system dependent upon its potential impact:

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

29. For some criteria, there is more than one way of achieving a ‘very positive impact’ or ‘very negative impact’. Similarly, some criteria may not achieve any negative impacts as all possible outcomes are positive. The ‘very negative’ impacts are usually reserved for criteria that are highlighted within the National Planning Policy Framework (NPPF) as a significant constraint to development, or those which would “significantly and demonstrably” outweigh any benefits.
30. At Stage 2(c), sites will also be considered against other NPPF considerations, such as whether a site is in employment use or playing fields, the loss of which would be contrary to national policy.
31. Since Regulation 18 of the Mid Sussex District Plan, an amendment has been made to the two Heritage criteria; Criterion 5: Listed Building and Criterion 6: Conservation Area. The change reflects comments received at Regulation 18 and the Members Working Group, as well as a review of the NPPF, that ‘great weight should be given to the [heritage] asset’s conservation [...] irrespective of whether any potential harm amounts to [...] less than substantial harm to its significance.’. Therefore, any site concluding ‘Less than Substantial Harm’ will achieve ‘negative impact’, unless an assessment or review of heritage assets has been undertaken to enable the consideration of potential suitable mitigation on the identified heritage assets of the proposed scheme. In this circumstance, a ‘Neutral impact’ is reached.
32. A full list of the criteria is set out in **Appendix 1**.



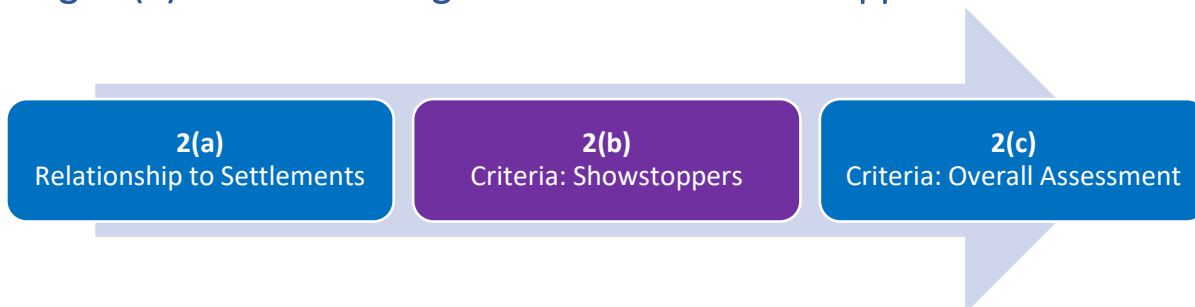
## Assessment and weighting

33. The first section of the assessment considers the Environmental constraints. This section of the criteria has been developed to reflect the requirement of the NPPF to steer development away from the most environmentally sensitive locations. The Council will use the site selection stage to ensure that the greatest weight is given to those criteria.
34. The second section of the assessment looks at the Developability considerations. This will take account factors such as availability of sites and the achievability of appropriate and safe access.
35. The third section of the assessment looks at Accessibility; the proximity and connection of sites in relation to services to ensure sites are located in the most sustainable places.
36. Once all the sites have been assessed they will be ranked against other sites, according to how they perform against the Site Selection criteria. This ranking will not be a simple totalling of the number of 'Very Positive' → 'Very Negative' impacts because some criteria carry more weight than others. For example, the impact on AONB carries more weight than distance to a local service.

## Evidence

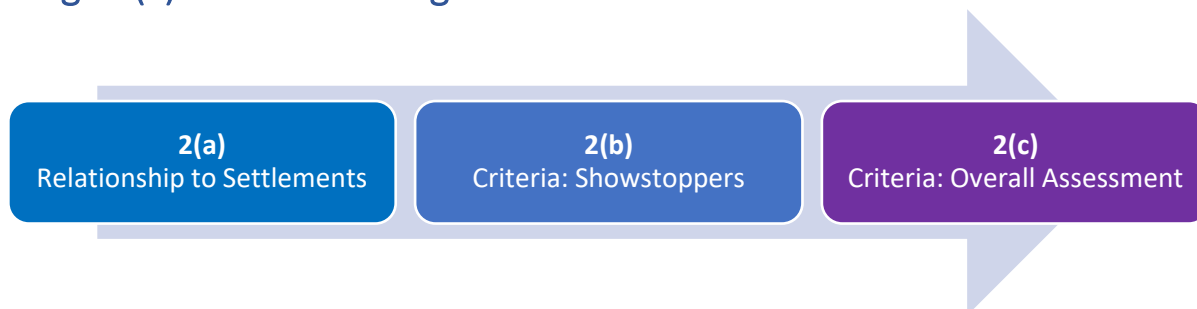
37. The assessment conclusions will be justified by the supporting evidence base and through liaison with stakeholders and statutory consultees. The source of evidence which inform the assessment are listed alongside the criteria information in the Assessment Framework.
38. The assessment will also be based on information provided by the site promoters at least up until the point of assessment. The Council welcomes the submission of any evidence/technical reports/etc that would assist in undertaking the assessment.
39. It may be possible to improve the impact against certain criteria by mitigating negative impacts. However, in order to provide a consistent approach, it is not for the Council, at this stage, to establish the specific mitigation that would be required in order to improve any negative impacts. However, a high-level assessment will be made as to whether negative impacts could, in theory, be mitigated (for example, Ancient Woodland can be mitigated by the application of a 15m buffer or excluding the area from the developable area of the site), as already noted in the Site Selection Criteria.
40. If any specific mitigation measures/infrastructure provision has been provided by site promoters within their site submission or subsequent correspondence, these will be considered when undertaking the assessments. If the promoters do not provide this information, it will be assumed that no mitigation/additional infrastructure is to be accounted for within the assessment process. The Council will continue to engage proactively with site promoters to explore mitigation measures, and promoters will have the opportunity to comment and provide further information on mitigation (should it be required) once the initial assessments have been completed.

## Stage 2(b): Assessment against Criteria – Showstoppers



41. In order to ensure that the detailed assessment strictly focusses on those sites most likely to be considered reasonable alternatives, an initial review of the site assessments will take place to exclude sites with the greatest constraint i.e. showstoppers, or where a significant proportion of a site is affected. This will ensure that sites are not excluded in their entirety where alterations to a site boundary could be made to remove absolute constraints or where areas of absolute constraints could be considered for other uses.
42. Showstoppers are those environmental constraints and deliverability considerations for which the site assessment can result in a very negative impact against the site assessment criteria ('red'). This approach is supported by the NPPF which is clear that development in the most environmentally sensitive locations should be avoided. Therefore, the Council will use this stage of the process to ensure that the greatest weight is given to those relevant criteria. See list below:
  - High Impact on the High Weald AONB
  - Significant area of flood risk/Historic flood events
  - Direct loss or harm to ancient woodland
  - High impact on biodiversity designation of national importance (SSSI)
  - Substantial harm to a Listed Building
  - Substantial harm to a Conservation Area
  - Severe impact on archaeological asset
  - Severe access issues that are not likely to be mitigated
43. In addition, there are some sites within the SHELAA that lack evidence to demonstrate that the site is available for development (for example, where no contact can be made with the landowners). These sites will also be excluded at this stage.
44. The sites rejected at this stage will not be subject to further assessment as they do not represent sustainable development.

## Stage 2(c): Assessment against Criteria - Overall Assessment



45. The sites left in the pool of sites once Stage 2(a) and 2(b) have been completed will be subject to further detailed assessment taking into account the performance against all criteria. Whilst there will not be any 'Showstoppers' on these sites, a combination of negative impacts against the criteria as a whole may render the site unsuitable for allocation, and therefore be rejected at this stage. A site may also be rejected at this stage if the loss of the site's current use is concluded to be contrary to national policy.
46. The degree of constraints and how this could impact on potential development will be considered, as well as whether they can be overcome. Other considerations such as planning history will also be reviewed at this stage in order to provide a meaningful overview of the constraints impacting each site proposed for development.
47. The assessment will provide consideration of sites against 'Made' Neighbourhood Plans, if applicable. There is not a specific criterion for this within the assessment criteria due to the differences in content of the various Neighbourhood Plans, and the need to be consistent when assessing sites, however commentary will be provided which will inform the conclusion. The assessment will take into account any land use designations in the Neighbourhood Plans on the site and consideration will be given to how this designation may impact on the delivery of the site for housing uses. However, it is important to note that the objective of the District Plan will be to, as a minimum, meet the housing needs of Mid Sussex and this may result in conflict with policies in Neighbourhood Plans. Any such conflict would be discussed with the relevant Town or Parish Council.
48. A 'fact-checking' exercise will be undertaken on all sites that reach at least Stage 2(b) to ensure factual accuracy of results. The findings of the assessment will be shared with the site proponents of each site who will be invited to report any identified factual errors to the Council to inform the final assessment.
49. This process will provide site proponents with the opportunity to verify quantitative conclusions or note if the assessment has overlooked proximity to a key feature or service which might affect the overall suitability of the site. It will also be an opportunity to review the way in which officers applied the Council's assessment methodology, though the fact checking exercise is not designed to be a forum for disputing qualitative findings and professional judgement of officers.
50. A 'fact checking' exercise was undertaken in November 2021. The comments received from site promoters and the Council's response can be found at Appendix 2 of the Site Selection Conclusions Paper. A similar exercise will be done for new sites submitted during the Regulation 18 consultation.
51. A qualitative commentary will be provided to detail the rationale for excluding sites at this stage.

52. The sites rejected at this stage will not be subject to further assessment and will not be included in the 'development scenarios' that will be tested through Sustainability Appraisal and other detailed evidence testing at Stage 3.

## Stage 3: Scenario / In-Combination Testing

53. All sites that progress past Stage 2(c) will be subject to detailed testing and due diligence, as these form the sites with the greatest potential for allocation.
54. Whilst Stages 2(a), 2(b) and 2(c) will be carried out on an individual site basis, Stage 3 includes testing the sites “in combination” with each other by way of likely development scenarios or testing of a ‘preferred option’.

### Further evidence testing

55. Once a development scenario(s) has been developed, these will then be subject to further evidence testing which will include:
  - Transport Modelling
  - Habitats Regulations Assessment
  - Air Quality Modelling
  - Viability Assessment
56. Findings from the evidence testing will inform the conclusions within the Sustainability Appraisal.

### Sustainability Appraisal

57. A key part of the evidence base of the District Plan is the Sustainability Appraisal (SA). It is a systematic process that must be carried out during the preparation of a local plan. Its role is to promote sustainable development by assessing the extent to which the plan, when judged against all reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA allows for the consideration of opportunities to improve environmental, social and economic conditions in the local area and identify how to mitigate the impact of development.
58. All sites considered to have potential for allocation at the end of Stage 2 will be assessed against the Sustainability Framework to consider the sustainability credentials of each site independently and cumulatively. The findings of this work will help identify potential scenarios to address the housing need in the district and corresponding preferred options.
59. The SA is applied as an iterative learning process running parallel to the preparation of the District Plan. Therefore, the findings of the further evidence testing will inform the content of the SA, as well as the SA identifying further options that may need to be tested further through the evidence base.

### Stage 3 Outputs

60. The SA will draw conclusions on the most sustainable development options and report the process in full. An additional topic paper which concludes on the preferred development scenario, taking into account the findings of the SA as well as other considerations through further evidence testing, will document the reasons for the preferred development scenario to be included within the District Plan Review.

## Next Steps

61. All SHELAA sites will be assessed through the methodology outlined above.
62. The Site Selection methodology provides a clear and transparent process for the selection of sites for inclusion in the development strategy of the District Plan. The selection process will enable evidence-based decisions to be made on the most sustainable development strategy for Mid Sussex.
63. The NPPF states that plans should “provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas” (NPPF, paragraph 11). Until the site assessment work is undertaken it is not known to what extent the District Plan will be able to meet the housing needs of Mid Sussex and potentially unmet need arising elsewhere. The site selection process may therefore need to be an iterative process, with the outcomes at Stages 2 and 3 revisited if necessary, to ensure these requirements have been fully considered.

## Appendix 1: Site Selection Criteria

### Environmental constraints

Criteria 1	Landscape		
<b>Policy background</b>	<p>“Planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils... recognising the intrinsic character and beauty of the countryside” (NPPF 2023, para 174)</p> <p>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designated to avoid or minimise adverse impact on the designated areas” (NPPF 2023, para 176)</p>		
<b>Source</b>	High Weald AONB Unit, Capacity of Mid Sussex District to accommodate development (LUC, 2014), SHLAA: Review of Landscape and Visual Aspects of Site Suitability (LUC, 2015), High Weald AONB Unit Assessments, South Downs National Park Authority Assessments		
<b>Assessment</b>		<b>Sites Within the AONB</b>	<b>Sites Outside the AONB</b>
		High impact on the AONB/ Likely major development in the AONB with no identified exceptional circumstances	
		Moderate impact on the AONB	Low to low/medium potential for change in landscape terms
		Low impact on the AONB	Medium potential for change in landscape terms
			Medium/high potential for change in landscape terms
		High potential for change in landscape terms	
<b>Note</b>	<p>Assessment of site will be based on the location within or outside the AONB. Sites located within the AONB will be subject to the High Weald AONB Unit own assessment criteria and knowledge, while conclusions for sites outside the AONB will be drawn for each site dependant on which Landscape Capacity area they are within (as determined by the landscape capacity studies, based on their assessment methodology) or comments received from specialist advisors. Views will be sought from the South Downs National Park Authority and the AONB Unit for sites located within their settings to support the assessment.</p>		

Criteria 2	Flood risk	
<b>Policy background</b>	<p>“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” (NPPF 2023, para 159)</p>	
<b>Source</b>	Environment Agency Flood Risk Zones, MSDC Strategic Flood Risk Assessment	
<b>Assessment</b>		Site affected by significant areas of flood risk/historic flood events which would affect the site’s developability
		Site has areas within flood zone 2/3 or has flooded historically
		Site has small areas within Flood Zone 2/3, no known historic events

		Sites has flooded historically but is not within Flood Zone 2/3 Site is adjacent to Flood Zone 2/3, potential future flood risk
		Site unaffected by flood risk
<b>Note</b>	Where flood risk would make a site undevelopable (due to the location of the area at risk from flooding, or the amount of site at risk from flooding) it will be assessed as 'Significant'.	

<b>Criteria 3</b>	<b>Trees</b>	
<b>Policy background</b>	<p>"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists." (NPPF 2023, para 180c)</p> <p>"Planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside – including...trees and woodland." (NPPF 2023, para 174b)</p> <p>Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. (NPPF 2023, para 131)</p>	
<b>Source</b>	Mid Sussex Ancient Woodland Inventory (GIS), Woodland Trust Ancient Tree Inventory, Tree Preservation Orders (GIS), consultation response from MSDC Tree Officer	
<b>Assessment</b>		<p>Site is affected by significant amount of ancient woodland and/or Ancient and/or Veteran Trees. Development of the site would result in direct loss or harm which cannot be mitigated.</p> <p>Site is partially affected by ancient woodland and/or Ancient and/or Veteran Trees. Development of the site would result in some harm, but mitigation is required. Significant part of the site is covered by trees and/or there is presence of protected trees on/adjacent to the site. Development would result in loss, objection from Tree Officer.</p> <p>Site is adjacent to an area of ancient woodland or within a 15m buffer from an area of ancient woodland. Development of the site may result in some harm, but mitigation can be achieved. Presence of protected trees on/adjacent to the site which would constrain development. Tree Officer concludes that potential impacts can be mitigated.</p> <p>Presence of trees on site or along the boundaries,</p> <p>Site not affected by trees</p>
<b>Note</b>	<p>The assessment will be applied to both ancient woodland and trees. Where the proposed site is likely to impact on more than one, the overall assessment will reflect the highest impact identified, but the comments will refer to specific assets. Where presence of ancient woodland would make a site undevelopable (due to the location or the amount of ancient woodland that cannot be mitigated) it will be assessed as 'Significant'.</p> <p>Impact on trees will be determined by the MSDC Tree Officer based on their own assessment criteria and knowledge.</p>	





<b>Criteria 4</b>	<b>Biodiversity</b>
<b>Policy background</b>	"development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted." (NPPF 2023, para 180b)


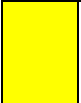



	<p>“Plans should distinguish between the hierarchy of international, national and locally designated sites’ (NPPF 2023, para 175)</p> <p>“To protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity” (NPPF 2023, para 179a)</p>		
<b>Source</b>	Natural England SSSI dataset and Impact Risk Zones, consultation responses from Natural England/Sussex Wildlife Trust.		
<b>Assessment</b>		<b>Nationally designated sites</b>	<b>Locally designated sites</b>
		Site is adjacent/in proximity to a SSSI, Objection from NE	
		Site is adjacent/in proximity to a SSSI, NE concluded impacts can be mitigated	Site is within or adjacent/in proximity to an LWS, Objection from Sussex Wildlife Trust
			Site is within or adjacent/in proximity to an LWS, Sussex Wildlife Trust conclude impacts can be mitigated
		No objection raised by NE or Sussex Wildlife Trust despite proximity with designated site, or site not within or adjacent to designated site	
<b>Note</b>	Impact on Sites of Special Scientific Interest (SSSI), nationally designated sites, will be determined by Natural England (NE) based on their own assessment criteria and knowledge. Impact on locally designated sites (Local Wildlife Sites - LWS/Local Nature Reserves - LNR) will be determined by Sussex Wildlife Trust (SWT).		


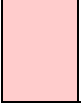


<b>Criteria 5</b>	<b>Listed Building</b>		
<b>Policy background</b>	<p>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2023, para 199)</p>		
<b>Source</b>	Historic England Listed Buildings (GIS), consultation response from MSDC Conservation Officer		
<b>Assessment</b>		Listed buildings are present on/within proximity of the site, Substantial harm – Harmful impact	
		Listed buildings are present on/within proximity of the site, Less than substantial harm	
		Listed buildings are present on/within proximity of the site, Less than substantial harm – but potential for suitable mitigation	
		No Listed buildings on/near the site – No impact	
<b>Note</b>	<p>Comments from MSDC Conservation Officer will determine whether there is predicted to be Substantial Harm/Harm/No Impact based on site layout information submitted by site proponent (where provided).</p> <p>Where the proposed site is likely to impact on more than one Listed building, the overall assessment will reflect the highest impact identified, but the comments will refer to specific Listed Buildings.</p>		

<b>Criteria 6</b>	<b>Conservation Area</b>		
<b>Policy background</b>	<p>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2023, para 199)</p>		

<b>Source</b>	Historic England Listed Buildings (GIS), consultation response from MSDC Conservation Officer
<b>Assessment</b>	 Site is within/close to a conservation area, Substantial harm – Harmful impact
	 Site is within/close to a conservation area, Less than substantial harm
	 Site is within/close to a conservation area, Less than substantial harm – but potential for suitable mitigation
	 There are no conservation areas within/close to the site – No impact
<b>Note</b>	Comments from MSDC Conservation Officer will determine whether there is predicted to be Substantial Harm/Harm/No Impact based on site layout information submitted by site proponent (where provided).

<b>Criteria 7</b>	<b>Archaeology</b>
<b>Policy background</b>	“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” (NPPF 2023, para 199)
<b>Source</b>	West Sussex County Council Archaeological Notification Areas (GIS), West Sussex County Council Archaeologist
<b>Assessment</b>	 Severe impact on archaeological asset – objection from County Archaeologist
	 Archaeological designation on/ adjacent to site. Moderate impact on archaeological asset – County Archaeologist has concluded that impact can be mitigated
	 No archaeological designations on/ adjacent to site. No impact on archaeological asset – No objection from County Archaeologist
<b>Note</b>	Impact on archaeological assets will be determined by West Sussex County Council Archaeologist based on their own assessment criteria and knowledge.

## Developability considerations

<b>Criteria 8</b>	<b>Availability</b>
<b>Policy background</b>	“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.” (NPPF 2023, Annex 2) “[...] a reasonable prospect that [housing sites] will be available and could be viably developed at the point envisaged.” (NPPF 2023, Annex 2)
<b>Source</b>	SHELAA Site Submission, Site Promoter (Developer Questionnaire)
<b>Assessment</b>	 The site is not/will not become available for development during the plan period
	 Whilst the site has been promoted for development through the call for sites or other source, there has been no further evidence submitted to demonstrate that the site is developable within the Plan period.
	 The site will become available for development during the plan period
	 The site is available for development within 5 years, supported by an option agreement with a housebuilder in place.
<b>Note</b>	Site promoter submissions, including responses to the questionnaire, will inform the assessment. The District Plan Review will cover a 17-year timeframe. The document will allocate some sites that are capable of delivery in the first 5 years of the Plan and others will come forward later in the Plan period. Therefore, the assessment is considering both deliverable and developable sites.

Criteria 9		Access										
<b>Policy background</b>	<p>“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” (NPPF 2023, para 111)</p> <p>“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that... safe and suitable access to the site can be achieved for all users.” (NPPF 2023, para 110c)</p>											
<b>Source</b>	WSCC Highways, MSDC Highways consultant											
<b>Assessment</b>	<table border="1"> <tbody> <tr> <td style="background-color: red;"></td> <td>No means/prospect of achieving suitable and safe access or approach to the site.</td> </tr> <tr> <td style="background-color: pink;"></td> <td>Access may be achieved through 3<sup>rd</sup> party land (no agreement in place). Site approach would require improvements to accommodate further development, achievability is uncertain.</td> </tr> <tr> <td style="background-color: yellow;"></td> <td>Access does not exist but can be achieved within landholding to adjacent highway or through 3<sup>rd</sup> party land (agreement in place). Site approach would require improvements to accommodate further development, which could be achieved</td> </tr> <tr> <td style="background-color: lightgreen;"></td> <td>Site access exists and minor improvements are required to provide a suitable and safe site approach</td> </tr> <tr> <td style="background-color: green;"></td> <td>No known constraints to access and site approach to accommodate development</td> </tr> </tbody> </table>			No means/prospect of achieving suitable and safe access or approach to the site.		Access may be achieved through 3 <sup>rd</sup> party land (no agreement in place). Site approach would require improvements to accommodate further development, achievability is uncertain.		Access does not exist but can be achieved within landholding to adjacent highway or through 3 <sup>rd</sup> party land (agreement in place). Site approach would require improvements to accommodate further development, which could be achieved		Site access exists and minor improvements are required to provide a suitable and safe site approach		No known constraints to access and site approach to accommodate development
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	Site access exists and minor improvements are required to provide a suitable and safe site approach											
	No known constraints to access and site approach to accommodate development											
<b>Note</b>	Officer assessment of whether there is a likely impact on local road network (based on the findings of the Mid Sussex Transport Study). Officer assessment to determine whether a suitable access can be achieved – any uncertain access arrangements will be assessed in more detail (e.g. in liaison with WSCC Highways and/or a detailed access study) and conclusions used to determine the impact for this criterion.											

## Accessibility factors

Criteria 10		Availability of Public Transport																																																						
<b>Policy background</b>	<p>“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued” (NPPF 2023, para 104c)</p> <p>“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” (NPPF 2023, para 105)</p>																																																							
<b>Source</b>	MSDC Sustainability Mapping (GIS)																																																							
<b>Assessment</b>	<table border="1"> <thead> <tr> <th colspan="2" rowspan="2"></th> <th colspan="4">Distance</th> </tr> <tr> <th>400m</th> <th>600m</th> <th>800m</th> <th>800+m</th> </tr> </thead> <tbody> <tr> <th rowspan="4">Frequency</th> <th>Bus Service</th> <td>Excellent</td> <td>Good</td> <td>Good</td> <td>Fair</td> </tr> <tr> <td>Excellent (4+/hour)</td> <td>Excellent</td> <td>Good</td> <td>Good</td> <td>Fair</td> </tr> <tr> <td>Good (2+/hour)</td> <td>Good</td> <td>Good</td> <td>Fair</td> <td>Fair</td> </tr> <tr> <td>Fair (&lt;2/hour)</td> <td>Good</td> <td>Fair</td> <td>Fair</td> <td>Poor</td> </tr> <tr> <td></td> <td>Poor (Infrequent)</td> <td>Fair</td> <td>Fair</td> <td>Poor</td> <td>Poor</td> </tr> <tr> <th colspan="2" rowspan="3">Train service</th> <th colspan="4">Distance</th> </tr> <tr> <th>&lt;800m</th> <th>&lt;1.2km</th> <th>&lt;1.6km</th> <th>&gt;1.6km</th> </tr> <tr> <td>Excellent</td> <td>Good</td> <td>Fair</td> <td>Poor</td> </tr> </tbody> </table>							Distance				400m	600m	800m	800+m	Frequency	Bus Service	Excellent	Good	Good	Fair	Excellent (4+/hour)	Excellent	Good	Good	Fair	Good (2+/hour)	Good	Good	Fair	Fair	Fair (<2/hour)	Good	Fair	Fair	Poor		Poor (Infrequent)	Fair	Fair	Poor	Poor	Train service		Distance				<800m	<1.2km	<1.6km	>1.6km	Excellent	Good	Fair	Poor
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		Excellent	Good	Fair	Poor																																																			

	Overall assessment		Train Service			
			Excellent	Good	Fair	Poor
Bus Service	Excellent	Excellent	Good	Good	Fair	
	Good	Good	Good	Fair	Fair	
	Fair	Good	Fair	Fair	Poor	
	Poor	Fair	Fair	Poor	Poor	
		Access to Public Transport and/or frequency of Public Transport in this location is poor				
		Access to Public Transport and/or frequency of Public Transport in this location is fair				
		Access to Public Transport and/or frequency of Public Transport in this location is good				
		Access to Public Transport and/or frequency of Public Transport in this location is excellent				
Note	Measured using the most practical walking route from the centre of the site to the nearest Public Transport. Based on MSDC Sustainability standards.					

Criteria 11	Access to Main Service Centre	
Policy background	<p>“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.” (NPPF 2023, para 86)</p> <p>“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued” (NPPF 2023, para 104c)</p>	
Source	TravelTime Mapping	
Assessment		<p>Journey likely by car only (greater than 20 minutes walk / 30 minutes public transport)</p> <p>Within 20 minutes walk / 30 minutes public transport</p> <p>Within 15 minutes walk / 20 minutes public transport</p> <p>Within 10 minutes walk</p>
Note	<p>For the purpose of this assessment, a main service centre is one which contains a main town or village centre where the majority of day-to-day facilities exist (for example, retail, community and leisure). For the purposes of this assessment, the Main Service Centres are defined as the three Town Centres (Burgess Hill, East Grinstead and Haywards Heath), the largest villages (Cuckfield, Lindfield, Hassocks, Hurstpierpoint) as well as services centres outside the district (e.g. Crawley and Brighton).</p>	

Criteria 12	Distance to Primary School	
Policy background	<p>“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should... give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications” (NPPF 2023, para 95)</p>	
Source	TravelTime Mapping	
Assessment		<p>Over 20 minutes walk</p> <p>Within 20 minutes walk</p> <p>Within 15 minutes walk</p> <p>Within 10 minutes walk/Expected to be provided on-site</p>
Note	<p>Mapped using TravelTime software, which calculates distance to this service using the most practical and fastest route. Based on arrival time before 9am.</p>	

<b>Criteria 13</b>		<b>Distance to Health Centre or GP Surgery</b>	
<b>Policy background</b>	<p>“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for...community facilities (such as health...)” (NPPF 2023, para 20c)</p> <p>“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles, especially where this would address identified local health and well-being needs” (NPPF 2023, para 92c)</p>		
<b>Source</b>	TravelTime Mapping		
<b>Assessment</b>		Over 20 minutes walk	
		Within 20 minutes walk	
		Within 15 minutes walk	
		Within 10 minutes walk/Expected to be provided on-site	
<b>Note</b>	Mapped using TravelTime software, which calculates distance to this service using the most practical and fastest route.		

<b>Criteria 14</b>		<b>Distance to Local Convenience Retail</b>	
<b>Policy background</b>	<p>“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.” (NPPF 2023, 79)</p>		
<b>Source</b>	TravelTime Mapping		
<b>Assessment</b>		Over 20 minutes walk	
		Within 20 minutes walk	
		Within 15 minutes walk	
		Within 10 minutes walk/Expected to be provided on-site	
<b>Note</b>	Mapped using TravelTime software, which calculates distance to this service using the most practical and fastest route. For the purposes of this assessment, Local Convenience Retail is defined as a convenience store which provides basic day-to-day needs (bread/milk/etc) in either a standalone location or as part of a neighbourhood centre.		

## Appendix 2: Significant Sites – Detailed Questionnaire

<b>Site Details</b>	
Site Address	
Number of residential units (Total)	
Number of residential units (In plan period)	
Amount of employment land	

<b>Promoter/Developer Details</b>	
Name	
Organisation	
Representing (if applicable)	
Telephone	
Email	
Role (i.e. promoter, developer)	

<b>Site ownership</b>	
Who owns the land?	
How many ownership are there?	
Is a promotion agreement in place with all landowners?	
If there is no promotion agreement in place, on what basis is the site being promoted.	

<b>Development Status</b>	
What progress has been made to date on site assessment work, in relation to:	
<i>Landscape</i>	
<i>Transport</i>	
<i>Heritage</i>	
<i>Wastewater</i>	
<i>Flood risk</i>	
<i>Other, as required</i>	
Has a masterplan been prepared, or is this underway?	
What work has been or will be undertaken in respect of infrastructure requirements, including liaison with infrastructure providers?	

<b>Delivery Matters</b>	

What are your current timeframes for submission of a planning application for the site?	
<i>Enter a PPA with District Council</i>	
<i>Pre-application meeting</i>	
<i>Pre-application publication engagement</i>	
<i>Submission of application</i>	
When do you anticipate construction on site commencing?	
When do you anticipate first completions?	

<b>Delivery Mechanism</b>	
Who are delivery partners?	
What is the delivery model?	
Will land be sold onto housebuilders?	
<i>How many developers are likely to be building on site at any one time?</i>	
<i>How many sales points do you anticipate will be on site?</i>	
Will the site deliver a variety of 'housing products' (i.e. older persons, build to rent, self-build, increased affordable provision)	

Anticipated Delivery Rates									
2023/24		2027/28		2031/32		2035/36			
2024/25		2028/29		2032/33		2036/37			
2025/26		2029/30		2033/34		2037/38			
2026/27		2030/31		2034/35		Beyond:			
If you anticipate accelerated delivery rates (i.e. above 150 units pa) please explain why this is a reasonable and justified assumption.									

Infrastructure	
What are the major on-site infrastructure requirements?	
What are the major off-site infrastructure requirements?	
<i>Have you entered into dialogue statutory bodies regarding infrastructure provision? And if so, what are the outcomes.</i>	
<i>How will the timing of infrastructure provision impact on the phasing/timescales for delivery</i>	



## Appendix 3: Responses to focussed consultation on Site Selection Methodology

Respondent	Stage/ Criterion	Comment	MSDC Response
Brighton & Hove City Council	1 - landscape	How will impacts on SDNP be assessed, same as outside the AONB?	The Plan area covers the district outside of those area within the South Downs National Park, therefore no site within the National Park will be assessed as part of the Site Selection process. However, the assessment framework accommodates for the consideration of the impact of proposed development on the setting of the National Park and the AONB.
Wealden District Council	Site identification	Should look at other sources of supply	Noted
	Stage 2a	Specific criteria should be provided (i.e. 150m from BUA)	For the purpose of the Site Allocations DPD, the Council introduced a minimum distance between the centre of the site and the BUA. However, experience showed that this may not always be relevant due to site specific considerations. As a consequence it was decided to remove this set distance for the District Plan Review and apply professional judgement of the connection between the site and existing settlements. For example a site might be in close proximity with the BUA but with no physical connection due to being separated by ancient woodland.
		Perhaps identify <i>settlements</i> which are wholly unsuitable; thus excluding sites in close proximity	It is considered that it would be premature at this stage to name unsustainable settlement ahead of considering potential capacity for each settlement and the potential to make them more sustainable. The sustainability of settlements will be assessed at a later stage of the process as the Council is collecting evidence and will feed into further evidence testing.
	Stages 2b and 2c	Information on how criteria is weighted should be included	Information on weighting is included in Stages 2(b) and (c) section of methodology.
	Criteria 5 and 6	Should apply to all heritage assets (SAM, Parks, battlefields WHS)	No world heritage site, Protected Wreck Site or protected battlefield within the District. Scheduled monuments are considered under archaeology criteria

	Appendix 1	Not clear why criteria 10-14 only have 4 categories when a weighted model is to be applied.	The Council did not assign 5 categories for each criterion but considered the relevant assessment level which could be applied to each criteria. It is key to reiterate that the intention is not to add up the outcome of each criteria assessment where reference is made to weighting but to recognise that at this point in the assessment, priority is given to environmental considerations.
	Appendix 2 additional questions	Any legal impediments to development? Any cross boundary infrastructure issues?	Noted - to be included within the questionnaire Covered under the infrastructure question
Adur & Worthing Councils	Appendix 1	Flood zones 2 and 3 should be separated out. Other sources of flooding should also be considered.	Noted in relation to other source of flooding and agreed - amend criteria
Kember Loudon Williams	Stage 2a	Support; particularly re self sufficient significant sites	Noted
	Stage 2b	Use of traffic light system is confusing at this stage. Showstoppers should be simplified to 'hard constraints' not those that might need expert input	May need to review the meaning of the traffic light system - my understanding is that green is the lowest impact and as we go towards red the impact is increasing.
	1 - landscape	Include additional wording from NPPF and PPG. Any site within the AONB should be 'very negative' impact. Sites outside AONB with low/medium should not be equal to moderate inside AONB, same for medium and low. High outside AONB is pointless as no sites.	The NPPF states that development within designated landscape areas should be limited and this is acknowledged in the scoring system proposed within the site assessment process (i.e. Site with high impacts and major development are considered as showstoppers). Excluding all sites within the AONB is not considered to be the appropriate approach as the Council also recognises that small scale development and allocations within the AONB might be necessary to address housing need and support the local economy. Site within the build-up area tends to be considered to have high potential for change in landscape terms.

2 - flooding	Question appropriateness of traffic light system for strategic sites.	The site assessment is aimed at acknowledging the constraints for each site, but it is recognised that some constraints can be mitigated in particular on larger sites.
3 - trees	Should be a score for opportunities	see para 39 and 40 on mitigation
4 - biodiversity	Question appropriateness of traffic light system for strategic sites and lack of opportunity score.	see para 39 and 40 on mitigation
5 & 6- listed building and CA	Merge criteria. Criterion 5 - unfair as does not take into consideration individual circumstances of site	Provides overarching position of potential impacts on historic assets. Merging criteria could make assessment less clear where a site may be subject to either a listed building or conservation area, keeping them as separate criterion will avoid this.
8 - availability	Sites in more than 1 ownership should be more negatively scored. Viability should form part of assessment.	with regard to ownership this is not considered to be always accurate and therefore the Council favours using evidence provided by site promoters of the potential for the site to come forward during the plan period. Viability testing at this stage of the process as the Council is still working on the likely policy requirements to be delivered alongside development. Viability will be considered at the further evidence testing stage.
9 - access	No allowance for betterment (wider benefits to road network)	Deliverability considerations for significant sites are to be investigated in more detail with site proponent via the questionnaire appended to the methodology in order to better understand the potential of each proposed site to deliver housing within the plan period.
10 - availability of transport network	Does not take into account walking and cycling.	Walking distances to key services reflected in criteria 11- 14.
11 to 14	No score for opportunities	The assessment of significant sites will focus on environmental constraints and accessibility factors to recognise their potential to be supported by on-site infrastructure and services which could enable them to be self-sufficient and deliver sustainable places. 'Excepted to be provided on site' is include for those criteria.