

# 219 – Sussex Wildlife Trust

## **Matter 2 The scale and distribution of development (location of development, spatial strategy, scale of development, site selection - policies H1, H2, H3 and SSA1 to SSA4)**

*Is the Plan positively prepared and justified, effective and consistent with national policy and the City Plan Part 1 in relation to the scale and distribution of development proposed and the site selection process?*

### **Issue 2 Site selection**

1. Was the methodology used to assess and select the proposed site allocations both in the urban area and urban fringe appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear? How did landscape and other constraints inform this process?

Sussex Wildlife Trust (SWT) does not believe that the methodology used to assess and select the proposed site allocations both in the urban area and urban fringe was appropriate.

Section 5 of the Site Allocations Topic Paper May 2021 [TP07] and sections 6.2 and 6.3 of the Sustainability Appraisal [SD05a] makes clear that only the Urban Fringe Assessments [ED21a-ED24] have been used to assess and select the proposed site allocations in within the Urban Fringe. For example, SA site appraisals were not used as part of the process to discount or reject sites.

SWT agree that the principle of allocating some housing sites in the urban fringe in order to help address the city's unmet housing needs was established through the CPP1 examination. However, we do not agree that the principles of allocating housing on designated sites was set. The CPP1 Inspector's Report [CD23] stated decisions on whether individual sites should be developed should be made through the process of the preparation of the CPP2.

We note that at the time of the CPP1 Inspector's decision, the 2012 version of the NPPF did not contain the requirement for plans to 'safeguard' locally designated sites or the associated Planning Practice Guidance (ID: 8-013-20190721). This was added in 2018 and continued in the current NPPF paragraph 179.

The Regulation 20 Consultation Statement Appendix 9 [SD09ai] sets out that a justification of the UFA methodology is set out in the UFA 2021 update [ED24]. However, section 2 of this document does not address the changes in the NPPF in the time since the original 2014 UFA methodology and merely states that the UFA 2014 is consistent with the approach to designated sites in the NPPF (para. 170-177) (equivalent of paragraphs 174 to 182 in the current 2021 version).

We understand that the UFA methodology looked at absolute constraints and secondary constraints. However, there is no evidence that a local biodiversity designation was considered as a constraint in its own right, particularly in terms of policy. The UFA considers the onsite ecology, rather than the designation itself or the value of the designated sites together as part of a wider ecological network that should be established,

conserved, restored and enhanced through the planning system and plan making process (NPPF paras 174 and 179).

Table 4 of the Housing Provision Topic Paper [TP06] shows that following the proposed Modifications, there is the potential to deliver 1,886 dwellings above the CPP1 requirement. Removing the housing allocations in policy H1 and H2 that are in Local Wildlife Sites or Local Nature Reserves and do not currently have any planning permission would reduce this delivery number by 212. This would still leave a surplus of supply of 1,684 dwellings, meeting the requirements of CPP1 and paragraph 179 of the NPPF.