



# **Cuckfield Parish Council**

## **NEIGHBOURHOOD PLAN**

### **PARISH HOUSING LAND AVAILABILITY ASSESSMENT (PHLAA)**

#### **METHODOLOGY**

**July 2012**

## **CUCKFIELD NEIGHBOURHOOD PLAN**

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## **1 INTRODUCTION**

The Cuckfield Parish Council (CPC) Housing Land Availability Assessment (PHLAA) is a study of the potential of the parish to accommodate additional housing development. The PHLAA will form part of the evidence base and background information to inform the Cuckfield Parish Council Neighbourhood Plan (CNP)..

This report sets out the method used to undertake the PHLAA assessment. Whilst this is not a District/Borough based Strategic Housing Land Availability Assessment (SHLAA), it will inform Mid Sussex District Council's (MSDC) SHLAA. Therefore, the 2007 government guidance<sup>1</sup> will be followed. It is based on MSDC's SHLAA methodology assessment (2008).

The PHLAA is a background paper only and it is not a statement of parish council policy and does not allocate land. It will form a part of the evidence base for CPC's Neighbourhood Plan and will be used to help inform judgements on the future development and allocation of land for housing. The PHLAA considers as many options as possible but does not pre-empt or prejudice any decision CPC may make in the future on any particular site and does not alter any polices or land use designations as set out in the CNP. Judgements concerning whether sites should be allocated in future Local Development Documents will be made through the statutory plan process which will further test the suitability of any sites identified in the PHLAA. The suitability of any sites appraised for particular development will be appraised through the statutory planning application process.

The PHLAA is one of several background documents and technical reports that are being prepared to inform the CNP. Further information on these background documents can be viewed on the website: [www.cuckfieldplan.co.uk](http://www.cuckfieldplan.co.uk) or by visiting the parish office.

## **2 PLANNING POLICY**

Planning policy as set out in the National Planning Policy Framework (NPPF) seeks a responsive approach to land supply at the local level and requires local authorities to:

- identify specific, deliverable sites for the first five years of a plan that are ready for development and to keep this topped up over-time in response to market information
- identify specific, developable sites for years beyond the first five, to enable a rolling five year supply
- where it is not possible to identify specific sites for later years of the plan period, indicate broad locations for future growth

The information contained within CNP will contribute to MSDC's District Plan housing supply. Final housing numbers and programme for delivery of these over the plan period will be reported to MSDC when the CNP is published. This is set in the context of

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<sup>1</sup> Strategic Housing Land Availability Assessments Practice Guidance (DCLG 2007) – <https://www.gov.uk/government/publications/strategic-housing-land-availability-assessment-practice-guidance-399267> (link checked Dec 12)

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- the draft District Plan's targets of 10,400 dwellings of that plan period,
- the recent and on-going rapid growth of Cuckfield village, with 103 dwellings already approved in the planning system (since 2011), with a further 63 since 2008 (The Copse development). This is set against the size of the village at 1342 dwellings<sup>2</sup> which highlights 13% growth in 5 years.

## 3 THE ASSESSMENT

### 3.1 Assessment purpose

The purpose of the Assessment is to:

- Identify sites with potential for housing
- assess their housing potential
- assess when they are likely to be developed.

The Assessment aims to identify as many sites with housing potential as possible in CNP plan area, by identifying and assessing the deliverability and developability of these

The Assessment is an important evidence source to inform plan making as it identifies:

- the recent pattern of housing development;
- the choices are available to best meet the need and demand for more housing;
- what action is required to ensure sites will become deliverable.

The Assessment is not a one-off study and it will be updated regularly as part of the monitoring process. A comprehensive full re-survey will not be undertaken unless a significant change is considered to make it necessary.

### 3.2 Time issues

The Assessment will cover the 20 year period from 2011 to 2031 to accord with the plan period for the new District Plan.

### 3.3 Assessment core requirements

The good practice guidance states that as a minimum, the Assessment should provide certain core outputs and follow minimum process requirements to ensure that it is robust and credible. The Assessment will therefore provide:

- a list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)
- an assessment of the deliverability/ developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed
- the potential quantity of housing that could be delivered on each identified site or on windfall sites
- the constraints on the delivery of identified sites
- recommendations on how these constraints could be overcome and when

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<sup>2</sup> 2001 census

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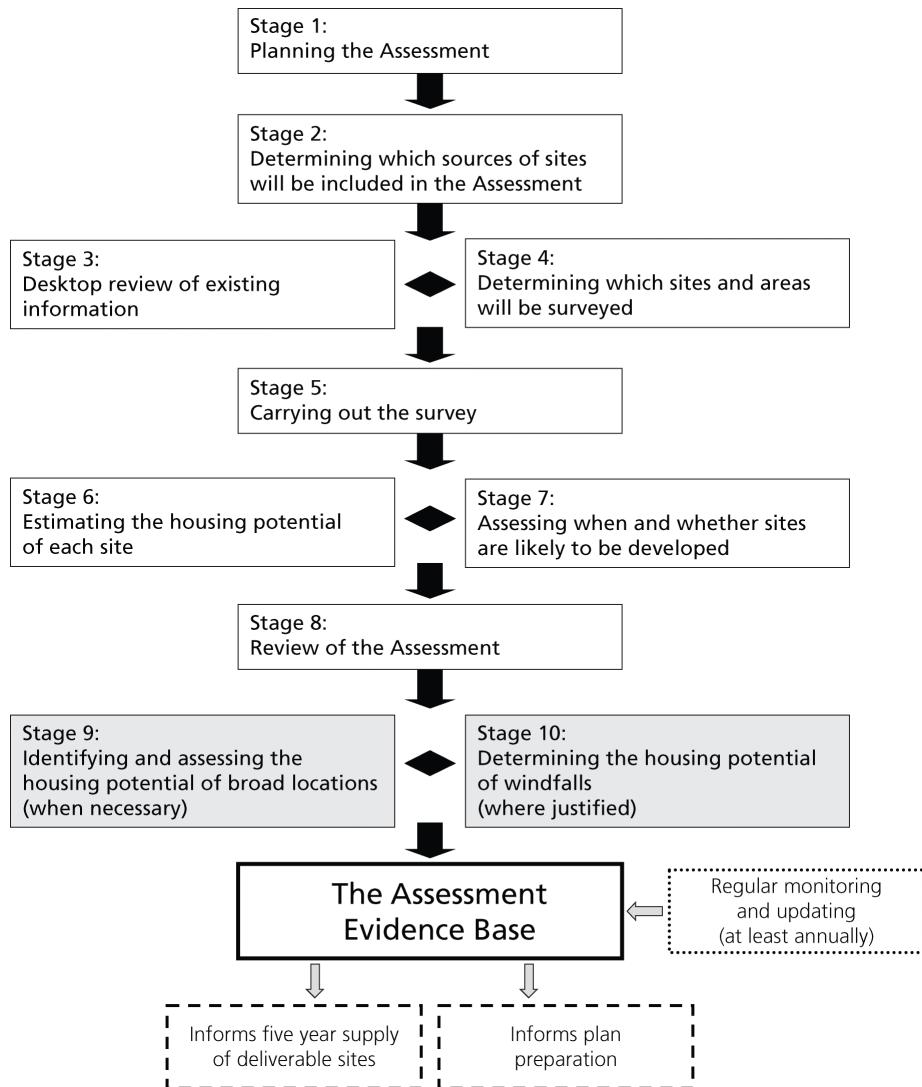
Assessment has been based on the suggested methodology outlined in the good practice guidance.

## 4 THE METHODOLOGY

The Government's Practice Guidance sets out eight main stages for the undertaking of an Assessment with two further optional stages. These optional stages cover

- (i) broad locations where housing development is considered feasible and will be encouraged but where specific sites cannot yet be identified;
  - (ii) windfall sites where a windfall allowance is justified by genuine local circumstances. The Methodology sets out in turn, how each of these stages is to be undertaken as part of the Assessment process. The stages of the Assessment are set out in Figure 1.

**Figure 1 – The Strategic Housing Land Availability Assessment process and outputs**



Source: Strategic Housing Land Availability Assessments Practice Guidance (DCLG 2007)

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**4.1 Stage 1 – Planning the Assessment**

Housing allocations surrounding Cuckfield have been a highly contentious issue over recent years, with the community reacting unfavourably to previous determinations by MSDC. Members of the Neighbourhood Plan team, comprising parish councillors and community representatives, therefore recognised early in the process the importance of Cuckfield undertaking a separate housing assessment to that undertaken previously.

A programme has therefore set out a fresh assessment on a parish scale to input into the CNP. Resources have mainly comprised the CNP team, with input from the team's professional planner.

**4.2 Stage 2 - Determining which sources of sites will be included in the Assessment**

Cuckfield parish is reasonably small. This means that all currently undeveloped sites within the plan area could be assessed. This includes any sites outlined in Table 1.

***Table 1 – Sources of sites with potential for housing***

Sites in the planning process
<ul style="list-style-type: none"><li>• land allocated (or with permission) for employment or other land uses which are no longer required for those uses</li><li>• existing housing allocations and site development briefs</li><li>• unimplemented / outstanding planning permissions for housing</li><li>• planning permissions for housing that are under construction</li></ul>
Sites not currently in the planning process
<ul style="list-style-type: none"><li>• vacant and derelict land and buildings</li><li>• surplus public sector land</li><li>• land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development</li><li>• additional housing opportunities in established residential areas, such as under-used garage blocks</li><li>• large scale redevelopment and re-design of existing residential areas</li><li>• sites in rural settlements and rural exception sites</li><li>• urban extensions</li><li>• new free standing settlements</li></ul>

*Source: Strategic Housing Land Availability Assessments Practice Guidance (DCLG 2007)*

Many of those above are not applicable in the parish but nonetheless will be reviewed for completeness.

In particular, sites previously considered by MSDC for previous planning purposes will all be addressed and considered.

Practice Guidance states that particular types of land or areas may be excluded from the Assessment where justified and agreed by the members of an assessment partnership (in this case the CNP PHLAA review team). It is suggested that if sites are identified that fall wholly within

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the designations or parameters set out in Figure 2, they should be assessed as having nil housing potential due to their inappropriateness for housing as national and local policy advises against development within these areas. If a larger site has any of these areas within its boundaries, then consideration will be given to its developable area following appropriate mitigation measures. Further information on possible mitigation measures will be sought from site promoters where necessary.

**Table 2 – Sites/areas to be excluded from the PHLAA**

- |   |
|---|
| <ul style="list-style-type: none"><li>• Ancient Woodland</li><li>• Local Nature Reserves</li><li>• Sites of Special Scientific Interest (SSSI)</li><li>• Sites of Nature Conservation Interest (SNCI)</li><li>• Scheduled Ancient Monuments</li><li>• Areas identified in the Mid Sussex Strategic Flood Risk as within Flood Zone 3</li><li>• Areas of open space identified as being of ‘high value’ in the Council’s PPG17 Open Space Assessment</li><li>• Sites wholly outside and unrelated to existing settlement built up area boundaries. An exception may be made for sites delivering 100% affordable housing to meet local need.</li></ul> |
|---|

The assessment will include looking at potential development sites within an Area of Outstanding Natural Beauty (AONB) and will need to take account of national and local policies for its protection. Development will not be ruled out but will need to be in accordance with local needs and in conformity with the primary objective of AONB policy, namely the enhancement and conservation of natural beauty. This will be reflected in the assessment of sites and in drawing up conclusions.

As part of the evidence base to inform the CNP, a Parish Landscape Assessment was undertaken in early 2012 to assess the physical and environmental constraints on development in the plan area with a view to identifying the capacity of the landscape to accommodate future development, and determine where such development would place an unacceptable impact on landscape character. The findings of this Landscape Assessment is reflected in the assessment of each site.

#### 4.3 Stage 3 - Desktop review of existing information

A systematic desktop search to identify potential housing sites and to review progress on known sites will be undertaken (as set out in Table 3).

**Table 3 – sources of information**

Housing source	Information source
Site allocations not yet the subject of planning permission	<ul style="list-style-type: none"><li>• Local Plan housing sites</li><li>• Small Scale Housing Allocation DPD sites</li></ul>
Planning permissions/ sites under construction	<ul style="list-style-type: none"><li>• Planning application records</li></ul>
Site specific development briefs	<ul style="list-style-type: none"><li>• Development briefs on unimplemented sites</li></ul>

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Housing source	Information source
Dwelling starts and completion records	<ul style="list-style-type: none"><li>Planning application records</li></ul>
Local Plan and Small Scale Housing Allocation DPD	<ul style="list-style-type: none"><li>Review all sites considered</li></ul>
Sites submitted following invitation during PHLAA process	<ul style="list-style-type: none"><li>Review all sites submitted following invitation to submit sites as part of PHLAA process</li></ul>
Ordnance Survey maps / aerial photography	<ul style="list-style-type: none"><li>A thorough review of all areas not included in above categories</li></ul>
Local knowledge from CNP team	<ul style="list-style-type: none"><li>A thorough review of all areas not included in above categories</li></ul>

During Stage 3 of the Assessment, **contact** will be made to all known interested parties requesting the formal submission of potential sites. This will be made to stakeholders already involved in the Assessment process and all known landowners. In addition, a '**call for sites**' press release will be issued to the local newspapers and information placed on the CNP website to inform parties not currently known to the Council. It is assumed that landowner's aspirations marked on previous MSDC SHLAA assessments are carried forward to this assessment.

#### 4.4 Stage 4 – Determining which sites and areas will be surveyed

##### ***Site visits***

Practice Guidance states that all sites identified by the desktop review should be visited to aid the robustness of the Assessment. This is of particular importance where information held on sites may be inconsistent or incomplete, to identify possible constraints to development and to track a site's development progress. It may not be necessary to visit each site identified by the desktop review, particularly those that have commenced development or are subject to extant planning permission. It is therefore proposed, that a site visit will not be necessary where comprehensive information on a site is known through a local understanding of the current situation. All other remaining sites (that meet the criteria as outlined below) will be surveyed as part of the Assessment and this will aid in providing evidence if there is a reasonable chance of a site being developed for housing.

##### ***Study parameters***

All potential sites and areas within the plan area are appraised, accounting for the list in Table 3. This is refined to a short list using the parameters in Table 2. There will be no minimum site size.

#### 4.5 Stage 5 - Carrying out survey

Following the desktop survey, members of the CNP team will visit all identified and submitted sites determined in Stage 4 of the Methodology in order to assess the sites' potential for housing development.

#### 4.6 Stage 6 – Estimating the housing potential of each site: Site suitability

The housing potential of a site refers to the number of dwellings that the site can be assumed to accommodate through its development or conversion of existing buildings. It is important that the

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PHLAA process recognises the balance that needs to be struck between making efficient use of land through good design principles without detriment to local infrastructure and harming the amenities of surrounding land uses, the character and historic fabric of the area, and the views of local residents. The suitability of each site is therefore assessed against a range of indicators, as set out below.

#### **A - Biodiversity**

A review of potential impacts on environmental designations, flora and fauna and proximity to current Tree Preservation Orders.

#### **B - Landscape**

A review at each site of:

- landscape value
- sensitivity
- capacity to change
- public views

As highlighted in the Parish Landscape Assessment

#### **C - Heritage or known archaeological impact**

A review of potential impacts on village heritage.

#### **D - Public access**

A review of public accessibility on or adjacent to the site

#### **E - Flood Risk Impacts**

A review of where the site sits in respect to the hydro-environment and Environment Agency flood zones.

#### **F - Sustainability - Accessibility on foot**

The 'distance thresholds' suggested are a broad and flexible guide to the distance which people in general will be willing to travel on foot in order to use or visit a facility. Cuckfield is a high car ownership area, with a significant elderly and young mother population, who have a lower propensity to walk longer distances than other sections of the community.

Distance measurements need to be as realistic as possible. For this reason, measurements will be taken from the centre of each site following a practical route that walkers will potentially use (a straight-line measurement 'as the crow flies' will therefore not be used). For this PHLAA, essential facilities are defined as retail centres (town and village centres), local shop/s, GP doctor, primary and secondary schools, recreation centres, bus stops.

#### **G - Infrastructure - Connection to services**

A review of any accessibility issues and other potential infrastructure constraints or capacity issues which may impact on the suitability of the site. For the purpose of the PHLAA, the criterion for infrastructure is defined as water, surface and foul water drainage, highways and transport, electricity and gas

#### **H - Infrastructure – impact on existing infrastructure**

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A review of the impact that potential development of each site may have on existing infrastructure, to ensure that shortfalls in services (as above) are identified.

#### I - Resident views

The Neighbourhood Plan will undertake detailed consultation on a range of issues. Residents and local businesses will be asked to state their preferences on where any future development should be located within the village.

#### 4.7 Stage 7 – Assessing when and whether sites are likely to be developed: Site achievability

Within the emerging District Plan, MSDC will need to identify sufficient and specific ‘deliverable’ sites to deliver housing within a five-year period and longer-term ‘developable’ sites. The CNP PHLAA will inform this.

In addition identification of those sites considered ‘not currently developable’ for housing development is required, when it is unknown when a site could be developed because for example, a constraint to development is so severe it is not known when it may be overcome.

- **Deliverable:** To be considered *deliverable*, a site should be *available* now, offer a *suitable* location for housing development and *achievable*, offering a reasonable prospect that housing will be delivered on the site within five years.
- **Developable:** To be considered *developable*, a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time

Guidance states that an assessment of the suitability, availability and achievability of a site will provide the information on which the judgements can be made in the plan making context as to whether a site can be considered deliverable, developable or not currently developable for housing development. This stage of the Assessment will therefore individually assess identified sites against these criteria.

#### PHLAA template

An assessment template has been developed and will be used to summarise the PHLAA, included in Appendix A. This accompanies this methodology report. Although it is difficult to provide any degree of certainty, particularly in the medium to long term, this will offer a clear, equal and structured method of assessment for all the sites to limit the application of subjective and inconsistent assumptions.

It should be noted that the assessment template was designed not simply as a means of determining whether a site is ‘in or out’ of the assessment, but as a first-stage tool to inform how the site could be developed, what would need to be done to achieve a successful development and when it might come forward and to be used as part of the qualitative consideration of all the available evidence. For instance a site may be acceptable but the market or other site-specific constraints may impede delivery.

As well as summarising the determination of site suitability, using the criteria outlined in Section 4.6, the template also assesses criteria for site characteristics, availability and achievability

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#### **Site characteristics**

The following site characteristics will be recorded:

- Site area
- Location with respect to the built up area boundary
- Use – Greenfield/brownfield and it's current use

#### **Availability**

A review of:

- Ownership
- Current planning status
- Owner indication of aspiration to develop

#### **Achievability**

A review of constraints, opportunities and impacts – summarising any potential issues which may reduce site deliverability or developability.

#### **Viability**

A review of economic factors and the likely marketability value of the site, and the current market for new housing in the village

#### **Summary of site suitability**

A summary of whether the site is suitable location for housing development and with a reasonable prospect that it is available and could be viably developed at the point envisaged.

#### **Potential capacity**

A potential yield of 25 houses per hectare is adopted as a starting point for all potential developments. This reflects the current density of Cuckfield, together with recent successful planning applications for larger developments. However, each site's final potential yield has been established on a site-by-site basis, taking into account the issues outlined in Section 4.6.

### **4.8 Stage 8 – Review of the assessment**

Once the initial survey of sites and the assessment of their deliverability/developability has been made, the housing potential of all sites will be collected to produce an indicative housing trajectory that sets out how much housing can be provided and at what point in the future. This will be forwarded to MSDC for inclusion within the District Plan.

### **4.9 Stage 9 – Identifying and assessing the housing potential of broad locations (where necessary)**

DCLG guidance states that broad locations are areas where housing development is considered feasible but where specific sites cannot yet be identified. Cuckfield does not have any sites which fall into this category.

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**4.10 Stage 10 – Determining the housing potential of windfall (where justified)**

Practice Guidance indicates that the supply of housing should be based on specific sites and where necessary, broad locations although there may be genuine local circumstances where a windfall allowance is justified.

It also states that where the inclusion of a windfall allowance can be justified, an allowance should be included but should be realistic having regard to historic windfall delivery rates and expected future trends.

An assessment of recent actual delivery rates within Cuckfield will be undertaken, and discussed within the CNP team.

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**Appendix A –  
PHLAA template**

Reference and location	NP Site reference		
	Previous MSDC reference		
	Location		
Site information	Compass location from village		
	Site area (ha)		
	Current built-up boundary		
Site Suitability assessment	Use	Brown/ greenfield/ redevelopment	
		Current use	
Biodiversity	Fauna (noted around parish)	Overall	
		Flora	
		TPOs	
Landscape	HDA area AONB Value Sensitivity Capacity Public views from area	HDA area	
		AONB	
		Value	
		Sensitivity	
		Capacity	
		Public views from area	
	Landscape summary		
Heritage or known archaeological impact			
Public access			
Flood risk impacts	Catchment Flood Zone: EA and SFRA Downstream flooding issues	Catchment	
		Flood Zone: EA and SFRA	
		Downstream flooding issues	
Sustainability: Walking access to infrastructure (km) (From centre of site)	School (HT) School (WP) Post office / shop Bus stop Doctor Cuckfield village Centre Public Recreation Space	School (HT)	
		School (WP)	
		Post office / shop	
		Bus stop	
		Doctor	
		Cuckfield village Centre	
		Public Recreation Space	
Connection to services	Highway & utilities Existing capacity	Highway & utilities	
		Existing capacity	
Impact from allocation on existing infrastructure			
Summary of consultation response			

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Site Available	Ownership	Single/ multiple	
	Current planning status		
	Owner indication of aspiration to develop		
Site Achievable	Constraints, opportunities and impacts		
	Viability		
	Suitable location for housing development and with a reasonable prospect that the site is available and could be viably developed at the point envisaged		
	Potential Capacity		
	Overall developable conclusion		
	0-5	0	0
	6-10	0	0
	11-20	0	0