

Matter 8, Issue 2, Question 1

Councillor John Milne (then HDC Deputy Leader and Planning Committee Chair) stated at an Extraordinary meeting of Billingshurst Parish Council on 7 Feb 2024 that HDC had prioritised small green field sites within the HDLP, as they are easier to deliver quickly. His justification was that this was necessary to meet HDC's 5 year housing supply target. This is an unsound and unjustified strategy for producing a plan that's meant to cover the period 2023-2040 and make effective use of brownfield and greyfield sites in accordance with NPPF para 119..

The HDLP glossary mentions Brownfield land registers (recommended by the NPPF and required by the Town and Country Planning (Brownfield Land Registers) Regulations 2017). However, HDC does not appear to have made use of one: it does not appear in the Examination Library evidence base.

The overall approach has resulted in a distorted balance towards greenfield development. Unsuitable greenfield sites have been included in the HDLP (e.g. STO1) simply because would-be developers declared the land to be available for development. HDLP also ignored brownfield sites in the Storrington Sullington and Washington Neighbourhood Plan, ignoring the requirement to prioritise its use in NPPF paras 119-120.

HDC's methodology for site assessment (Sustainability Appraisal and Habitat Regulations Assessment) has been shown to be not fit for purpose (see my response to Matter 1, Issue 2, Questions 3-7). Application of HDLP Strategic Policy criteria would have been a more 'sound' and effective approach to site down-selection.