

Planning Policy Committee – 26 September 2024

**AGENDA ITEM 4 – PUBLIC QUESTION TIME – ORDER IN WHICH THE
CHAIRMAN OF THE COUNCIL WILL INVITE QUESTIONS BELOW RECEIVED IN
WRITING IN ADVANCE OF THE MEETING**

1. From Johanne Tompson to the Chair of the Planning Policy Committee.

THE FULL DETAIL OF THE QUESTIONS TO BE ASKED IS DETAILED BELOW

NOTE: The Chair will:

- Invite questions from members of the public who have submitted in writing their questions in line with the Council's Constitution.
- Explain that the questions received will be answered by the appropriate Members of the Committee.
- Confirm that Public Question Time allows Members of the public to ask one question at a time and that a maximum of one minute is allowed for each question.
- State that questions will be invited in the order in which they have been received and that if there is time remaining from the 15 minutes allowed for Public Question Time, questioners will be allowed to ask a supplementary question.

QUESTION ONE

From Johanne Thompson to the Chair of the Planning Policy Committee

Will the Committee explain what criteria were used to determine those sites with "developable" status in the HELAA?

Response

Section 6 of the published 2021 HELAA report sets out the methodology used. Paragraph 6.37 states: **“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”**

QUESTION TWO

From Johanne Thompson to the Chair of the Planning Policy Committee

Will the Committee confirm that there is not an automatic presumption in favour of development for those sites currently labelled "developable" in the HELAA?

Response

There is not an automatic presumption in favour of sites labelled 'developable.'

Paragraph 2.2 of the 2021 HELAA report states: **"The Housing and Economic Land Availability Assessment (HELAA), is a technical study that determines the suitability, availability, and achievability of land for potential allocation through a further plan making process. It is an important evidence source to inform plan- making but does not in itself represent policy nor does it determine whether a site should be allocated for future development."**

Paragraph 3.1 goes on to say: **"The HELAA is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for housing or economic development or whether planning permission should be granted."**

QUESTION THREE

From Johanne Thompson to the Chair of the Planning Policy Committee

We note that prime agricultural land i.e. Best and Most Versatile (Grade 1-3a), is missing from Other Designations and the Suitability Criteria identified in paras 6.12 and 6.41 of the 2021 HELAA, despite the NPPF's Consultation document's clarity on the protection of BMV land in Chapter 5, para14. Will Committee consider adding the protection of BMV agricultural land into the assessment criteria for identifying the suitability of sites in the updated HELAA?

Response

The HELAA is an identification of potential and the issue of agricultural land is one of many issues that are considered and weighed in the balance when determining an application. If the HELAA was assessing all issues relevant to a planning application, it would be performing the role of a Plan and the HELAA is intended as a document where potential options and sites can be looked at for more detailed assessment either through the application or plan making process. It has been noted that the government is proposing removing the text from the NPPF that requires that the availability of land for food production should be considered when determining planning applications through its recent consultation. Whilst the accompanying consultation document makes some statements on this issue, the actual proposed text in the current NPPF (2023) is proposed to be deleted and we believe this will reduce the weight afforded to this issue, rather than increase it.

QUESTION FOUR

From Johanne Thompson to the Chair of the Planning Policy Committee

Will the Committee explain what criteria will be used to identify suitable sites for strategic housing allocations?

Response

These criteria have yet to be established.

QUESTION FIVE

From Johanne Thompson to the Chair of the Planning Policy Committee

Will the Committee consider factors such as the cumulative impact of existing and newly delivered housing development on infrastructure such as highways, transport, health services, community facilities and school places before allocating strategic sites for housing development?

Response

Yes. In determining any strategic housing allocation, consideration of these impacts will be assessed alongside consultation with the relevant infrastructure providers.

QUESTION SIX

From Johanne Thompson to the Chair of the Planning Policy Committee

Will the Committee consider strengthening its Local Plan to include policies which relate directly to the protection of BMV Agricultural Land so that Britain's future food security can be realised?

Response

It is too early to confirm what policies will be contained in any future Local Plan. The 2018 Plan has policies that relate to agricultural land, and we will need to consider whether these are included again and how/if to amend them. The Local Plan will need to be prepared in general conformity with the National Planning Policy Framework.

QUESTION SEVEN

From Johanne Thompson to the Chair of the Planning Policy Committee

Also, does the Committee support the production of a National Land Use Framework for England which has cross party support, to balance competing land uses such as: Agriculture, Housing, Transport and Energy Infrastructure etc. across the Sussex Region?

Response

At this time, the Council has not yet established any position on the potential for a National Land Use Framework for England.