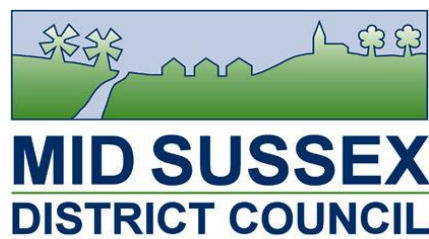


COUNCIL

22 JULY 2020



14 July 2020

Unless a majority of the Council resolve to extend the meeting before 10.00 pm it will automatically end at 10.00 pm in accordance with Council Procedure Rule 17.2.

New regulations came into effect on 4 April 2020 to allow Councils to hold meetings remotely via electronic means. As such, Council and Committee meetings will occur with appropriate Councillors participating via a remote video link, and public access via a live stream video through the [Mid Sussex District Council's YouTube channel](#).

To all Members of the Council,

You are hereby summoned to attend a meeting of the **MID SUSSEX DISTRICT COUNCIL** to be held **VIA REMOTE VIDEO LINK** on **WEDNESDAY, 22ND JULY, 2020 at 6.00 pm** to transact the following business:

Yours sincerely,

KATHRYN HALL
Chief Executive

Pages

1. Roll Call and Virtual Meeting Explanation.
2. Opening Prayer
3. To receive questions from members of the public pursuant to Council Procedure Rule 9.
4. To confirm Minutes of the meeting of Council held on 24 June 2020. **5 - 12**
5. To receive declarations of Interest from Members in respect of any matter on the Agenda.
6. To consider any items that the Chairman of the Council agrees to take as urgent business.
7. Chairman's Announcements.

Working together for a better Mid Sussex



- | | | |
|-----|--|------------------|
| 8. | Treasury Management Strategy Statement and Annual Investment Strategy 2020/21 - 2022/23. | 13 - 48 |
| 9. | MSDC Pay Policy Statement 2020/21. | 49 - 56 |
| 10. | Equality and Diversity Scheme 2020 - 2024 | 57 - 76 |
| 11. | Site Allocations Development Plan Document Submission Draft (Regulation 19). | 77 - 276 |
| 12. | Recommendations from Cabinet held on 6 July 2020. | 277 - 278 |
| 13. | To receive the Leader's Report | |
| 14. | Report of Cabinet Members, including questions pursuant to Council Procedure Rule 10.1 | |
| 15. | Questions from Members pursuant to Council Procedure Rule 10.2 | |

To: **Members of Council:** Councillors C Trumble (Chairman), M Belsey (Vice-Chair), G Allen, J Ash-Edwards, R Bates, J Belsey, A Bennett, L Bennett, A Boutrup, P Bradbury, P Brown, H Brunsdon, R Cartwright, P Chapman, R Clarke, E Coe-Gunnell White, P Coote, M Cornish, R Cromie, J Dabell, R de Mierre, B Dempsey, S Ellis, R Eggleston, A Eves, L Gibbs, I Gibson, S Hatton, J Henwood, S Hicks, S Hillier, T Hussain, R Jackson, J Knight, C Laband, Andrew Lea, Anthea Lea, J Llewellyn-Burke, A MacNaughton, G Marsh, J Mockford, A Peacock, C Phillips, M Pulfer, R Salisbury, S Smith, A Sparasci, L Stockwell, D Sweatman, N Walker, R Webb, N Webster and R Whittaker

**Minutes of a meeting of Council
held on Wednesday, 24th June, 2020
from 6.00 pm - 8.43 pm**

Present: C Trumble (Chairman)
M Belsey (Vice-Chair)

G Allen	J Dabell	Andrew Lea
J Ash-Edwards	R de Mierre	Anthea Lea
R Bates	B Dempsey	J Llewellyn-Burke
J Belsey	S Ellis	A MacNaughton
A Bennett	R Eggleston	A Peacock
L Bennett	A Eves	M Pulfer
A Boutrup	L Gibbs	R Salisbury
P Bradbury	I Gibson	S Smith
P Brown	S Hatton	A Sparasci
H Brunsdon	J Henwood	L Stockwell
R Cartwright	S Hicks	D Sweatman
P Chapman	S Hillier	N Walker
R Clarke	T Hussain	R Webb
P Coote	R Jackson	N Webster
M Cornish	J Knight	R Whittaker
R Cromie	C Laband	

Absent: Councillors E Coe-Gunnell White, G Marsh, J Mockford and
C Phillips

1. ROLL CALL AND VIRTUAL MEETING EXPLANATION

The Chairman welcomed everyone to the meeting and took a roll call of Members present. The Head of Regulatory Services provided a virtual meeting explanation.

2. OPENING PRAYER

The opening prayer was read by the Vice-Chairman.

3. TO RECEIVE QUESTIONS FROM MEMBERS OF THE PUBLIC PURSUANT TO COUNCIL PROCEDURE RULE 9.

The following question was received from Chris Bridge:

Burgess Hill and surrounding areas are totally underserved or in some cases abandoned in terms of public Electric Vehicle charging infrastructure. FOI requests show, after MSDC did not supply Cyprus Road's chargers with power for all of 2019, there has been a staggering 387% increase in usage over the previous reported period. Would MSDC provide a comprehensive update, including a timetable of dates, on the fabled 26 new fast chargers proposed to be installed across the district

by last year, (and the proposed Rapid charger at The Triangle), in a project that has lain dormant for more than 18 months.

Response from Cabinet Member Cllr J Belsey – Cabinet Member for Environment and Service Delivery

As you know this Council has no duty to provide Electric Vehicle Charging Points. It chooses to do so to support our sustainability objectives. This is why this Council has worked hard to progress a comprehensive procurement exercise to deliver these that will serve this Council and its partners across the District in the future.

The planned new chargers you refer to are one part of our comprehensive commitment and action. Our planning policy strongly supports charge points in new homes. This has already had a significant impact. All new homes in the Northern Arc development in Burgess Hill will have access to Electric Vehicle Charge Points. That is 3,500 homes.

The 26 new chargers are a project that, far from lying dormant, has and continues to have considerable MSDC officer time and effort devoted to it.

We are working alongside councils across West Sussex and the legal procurement documentation will be fully drafted by the end of this month. Following this, the OJEU notice will be published in July with the new contractor programmed to be in place later this year.

May I also respectfully remind Mr Bridge, that in the current global pandemic, this Council and its officers have (and will continue to have) very significant additional duties and responsibilities.

Mr Bridge asked a supplementary question seeking clarification on whether the Cyprus Grove and Hazel Grove chargers will be additional new chargers or replacement of the existing ones. The Cabinet Member agreed to confirm in writing to Mr Bridge.

4. TO CONFIRM MINUTES OF THE MEETING OF COUNCIL HELD ON 4 MARCH 2020.

The minutes of the meeting of Council held on 4 March 2020 were agreed as a correct record of the meeting.

5. TO RECEIVE DECLARATIONS OF INTEREST FROM MEMBERS IN RESPECT OF ANY MATTER ON THE AGENDA.

With respect to item 10 of the agenda, Councillor Hatton declared an interest as a Member of Hassocks Parish Council.

6. TO CONSIDER ANY ITEMS THAT THE CHAIRMAN OF THE COUNCIL AGREES TO TAKE AS URGENT BUSINESS.

None.

7. CHAIRMAN'S ANNOUNCEMENTS

The Chairman thanked the Vice Chairman and Councillor Anthea Lea for leading the previous Council meeting in his absence.

He acknowledged the impact that the Covid 19 pandemic has had on the District and led a minute silence to recognise those who have suffered loss during this time. He also paid tribute to all the first responders and many individuals who have contributed so much to the national and local effort.

8. HOMELESSNESS AND ROUGH SLEEPERS STRATEGY 2020-2025.

Councillor MacNaughton moved the item. The item was seconded by Councillor Walker who confirmed that it was reviewed and unanimously supported by the Scrutiny Committee for Housing, Planning and Economic Growth on 22 January 2020.

Discussion was held on the length of time people require temporary accommodation, and the individuals whom the Council are legally required to house. Discussion was also held on the options available to encourage landlords to make properties available, and the turnaround times for Housing Association void properties. It was noted that during the pandemic, Clarion has provided extra assistance by making void properties available for use as temporary accommodation.

Members also discussed the assistance provided to the Armed Forces Community and refuge provision. In terms of the number of people known to have no recourse to public funds, it was noted that the Council works closely with organisations such as Citizens Advice, Turning Tides, the YMCA and refugee organisations in order to contact as many vulnerable individuals as possible. The Cabinet Member indicated that he was not aware of any individuals approaching the Council in this category.

In light of the Government's recent announcement to provide more funding to address homelessness, the Cabinet Member for Housing confirmed that the Council will be entitled to funding and Officers are working on securing this.

The Chairman took Members to the recommendation which was approved.

RESOLVED

Council adopted the Homelessness and Rough Sleeping Strategy 2020-2025 as set out at Appendix 1 of the report.

9. TEMPORARY ACCOMMODATION REVIEW AND THE CONSIDERATION OF ADDITIONAL RESOURCES.

Councillor MacNaughton moved the item and provided updates to some figures contained in the report. Page.64 paragraph 8 should indicate a saving of £80,000 not £62,000, and £160,000 not £125,00. The report was seconded by the Deputy Leader who acknowledged the benefits of the £4.2m investment to help the homeless stay within their communities in such a difficult time.

Discussion focussed on the growing demand for temporary accommodation and the options available to the Council to address this, including purchasing properties, the mix of property types and lease options available, and support required from Homes England to provide Social Housing as soon as possible. It was also noted that a number of grants were available alongside the Government's Flexible Homeless Support Grant in order to provide intensive housing support to the most vulnerable residents in the District.

The Chairman took Members to the recommendations which were agreed.

RESOLVED

Council agreed to:

(i) provide additional resources of £4.2 m as a specific reserve to acquire temporary accommodation in order to meet the Council's statutory responsibilities under the Homelessness Legislation.

(ii) initially make £1.4m available to purchase 5 properties. The additional funds reserved to be accessed in stages as funds become available.

10. MAKING OF THE HASSOCKS NEIGHBOURHOOD PLAN.

Councillor MacNaughton moved the item and this was seconded by Councillor Walker.

The Ward Members for Hassocks thanked Hassocks Parish Council for its work over many years to get to this point.

The Chairman took Members to the recommendations which were agreed.

RESOLVED

Council noted the outcome of the Hassocks Referendum; and agreed to formally 'make' the Hassocks Neighbourhood Plan part of the Development Plan for the Parish of Hassocks.

11. RECRUITMENT OF INDEPENDENT PERSONS TO STANDARDS MATTERS.

Councillor Bradbury proposed the item as Chairman of the Standards Committee. He thanked Tony Cox who was stepping down. The item was seconded by Councillor Webster who highlighted the move to three Independent Members to be in line with proposals by the Committee on Standards in Public Life.

The Chairman took Members to the recommendation which was agreed.

RESOLVED

Council agreed to appoint three Independent Persons to the Standards Committee (Dr David Horne, Wendy Swinton Eagle and Paul Cummins) for a "four" year term from 24th July 2020 to 30 April 2024.

12. RECOMMENDATIONS FROM CABINET HELD ON 1 JUNE 2020.

The Deputy Leader proposed the item, and took Members through the recommendations, correcting a date error in the report which should read 25 September 2019, not 2020. The report was seconded by the Leader who noted that the Council's current financial position has been significantly affected by the Covid 19 pandemic.

The Chairman took Members to the recommendations which were agreed.

RESOLVED

Council approved:

(i) that grant income as set out in paragraph 12 of the Cabinet report be transferred to General Reserve;

(ii) that grant income as set out in paragraph 13 to 18 of the Cabinet report be transferred to Specific Reserves;

(iii) that requests totalling £38,000 be transferred to Specific Reserves as set out in Table 1 of the Cabinet report;

(iv) that £50,000 be transferred to the Community Development Fund Specific Reserve from General Reserve as detailed in paragraph 20 of the Cabinet report;

(v) that balance of interest totalling £334,691 as set out in paragraph 21 of the Cabinet report is transferred to the General Reserve;

(vi) that Dividend income totalling £16,962 as set out in paragraph 24 of the Cabinet report is transferred to the General Reserve;

(vii) that the 2020/21 capital programme be increased by £1,291,000 as a result of slippage of some 2019/20 capital projects as detailed in Table 2 of the Cabinet report;

(viii) that the revenue overspend in 2020/21, totalling £10,000, be met from General Reserve.

13. TO RECEIVE THE LEADER'S REPORT

The Leader expressed condolences to all residents who have been affected by the Covid 19 pandemic and thanked the Council's staff and contractors for the way they have responded to the challenges it poses.

He noted that the pandemic has had a profound effect on the Council and officers continue to work hard to meet the unprecedented demand for support from both residents and the local economy.

He confirmed that despite the Council setting a robust and sustainable budget in March, as a result of the pandemic, a £4.3m deficit is forecast this year. A revised Corporate Plan will be presented to Council in September and decisions will be needed to reprioritise and amend existing plans. The review will include measures to build resilience in case of a second spike of infections and the increasing demand for people accessing services and extra support and benefits.

He noted that the single biggest impact to Council finances is the Government mandated closure of Leisure Centres and despite £1.5m support received from the Government so far, it is critical that further support is forthcoming. He noted that regardless of when the Government confirm that leisure centres can reopen, it will be some time before they will actually open, due to costs involved, and preparations needed to ensure they can safely and sustainably operate. When they do open, they will necessarily run at lower capacity. In answer to a Member's question on prioritising the pool reopening, he confirmed that officers are modelling options to

understand what may be possible and costs involved and noted that the Government still required pools to remain closed.

A Member posed questions to the Leader regarding the demolition of the Martlets Hall. The Leader confirmed that he had provided the Councillor with this information on two occasions already and that a report to Cabinet is likely in early July. He confirmed that decisions on Council assets are for this Council to make and reiterated that the Covid 19 response needs to take priority over all Council work. With regard to discussion on increasing footfall in Burgess Hill, he noted that the town centre regeneration is a private sector project and not a capital project for the Council and therefore the timing of the redevelopment lies with New River REIT.

14. REPORT OF CABINET MEMBERS, INCLUDING QUESTIONS PURSUANT TO COUNCIL PROCEDURE RULE 10.1

Report of the Deputy Leader

The Deputy Leader noted that the year-end performance report was discussed at Cabinet in June. It was agreed that the performance indicators will need to be reviewed to reflect the impact of the pandemic.

She noted that lease renewals continue at the Orchards Shopping Centre which is a positive indicator for the local economy, and that activity continues with the Place and Connectivity consultation which concludes on 25 June.

Discussion was held on the impact of the pandemic on funds available for the Place and Connectivity project, measurements of footfall in the town centres and the greenways in Haywards Heath.

Report of the Cabinet Member for Economic Growth

The Cabinet Member thanked the three Business Associations for the way their part-time administrators have reacted to the pandemic, providing a conduit between their members and the public sector. He also thanked the Council's Officers for their work with local businesses.

He noted that parking charges ceased in March to meet the higher demand for residents parking. Charges have now resumed with the caveat that parking is still free for NHS workers. Income data should be available in July and indications show that a shortfall of approximately £1m is expected.

He confirmed that measures have been put in place to ensure the highstreets can reopen safely and thanked the Town and Parish Councils in this regard. He also noted that the Economic Strategy will be reviewed in due course to take account of the effect of the pandemic and the Council is working with local economic bodies to ensure their priorities reflect the dynamics within the District.

Discussion was held on the licence offered to McDonalds to use the car park in Burgess Hill, to assist the police in addressing the impact of cars visiting the restaurant.

Report of the Cabinet Member for Customer Services

The Cabinet Member highlighted the work being carried out by Officers to meet the increased demand for services during recent months. She noted that Mid Sussex

Matters will be delivered to residents in July, the Full Fibre project is on target to commence in the summer and the Burgess Hill project is currently out to tender and includes a call for apprentices.

She agreed to look into whether virtual Committee meetings could be live-streamed on Facebook as well as YouTube.

Report of the Cabinet Member for Environment and Service Delivery

The Cabinet Member confirmed that all waste collection and street cleaning services are operational and thanked Serco and ID Verde for maintaining their services during such a difficult time.

He noted that parks in the District are open, with the main town parks having increased signage to keep residents safe. Increased litter picks have been put in place. The consultation on Masterplans in four parks has resumed and work will be implemented on a phased basis as S106 funding becomes available. As the Government has confirmed that playgrounds and outdoor gyms can now reopen from 4 July the Council has begun risk assessing these, whilst awaiting further Government guidance. A communications plan will be put in place to ensure residents are informed of reopening information. He also reiterated the Leader's comments that when other facilities such as indoor gyms and indoor play areas can reopen, they will be significantly changed due to the high costs involved.

Further discussion was held on the electric car charging points within the District.

Report of the Cabinet Member for Community.

The Cabinet Member thanked Members for their engagement in training sessions to successfully conduct virtual meetings.

He noted the increased support that has been provided to support the shielded residents within the District. He confirmed that requests to the Environmental Health services has increased and will continue to do so regarding licensing and food hygiene inspections as pubs and bars reopen.

He noted that the pandemic has impacted on the ability to deliver traditional wellbeing services with no face to face interventions, but three additional services have been introduced in the last quarter of 2019/20 regarding alcohol support, health checks and stopping smoking. VE Day celebrations were also impacted but virtual celebrations were met with positive engagement.

Report of the Cabinet Member for Housing and Planning

The Cabinet Member confirmed that a Flexible Homeless Support Grant and New Burdens Homeless Reduction Grant received from the Ministry of Housing, Communities and Local Government will continue to fund the work mentioned in the reports presented to this Council meeting, along with any funds available from the recent Government provision to address homelessness.

He noted that the pandemic has had an impact on the number of social houses being built. To address Member's concerns, he confirmed that the Council is committed to holding Developers to account in meeting their social housing provisions in any

applications that come forward. He also confirmed that Officers continue to carry out the required site visits.

15. QUESTIONS FROM MEMBERS PURSUANT TO COUNCIL PROCEDURE RULE 10.2

None.

The meeting finished at 8.43 pm

Chairman

TREASURY MANAGEMENT STRATEGY STATEMENT AND ANNUAL INVESTMENT STRATEGY 2020/21 TO 2022/23

REPORT OF: Head of Corporate Resources
Contact Officer: Peter Stuart
Email: peter.stuart@midsussex.gov.uk Tel: 01444 477315
Wards Affected: All
Key Decision: No
Report to: Council, 22 July 2020

Purpose of Report

1. This report sets out the Council's investment and borrowing strategy for the forthcoming three years and reports the counterparty list with which investments may be made. It also sets out the Prudential Limits that provide the parameters for approved future lending and borrowing, including the incidental cost of so doing.

Summary

2. The Strategies were presented to the Audit Committee at its meeting in March 2020 but the Covid 19 pandemic has delayed their agreement by Council until now. The Audit Committee was content that the strategies could be recommended to Council.
3. Lending is restricted to the same counterparties and within the same limits as in the previous strategy approved in March 2019 except for the following amendments:
4. Halifax and HBOS have been removed as they are no longer on the suggested credit list supplied by Link Asset Services.
5. The limit for investment in the Local Authorities' Property Fund has been amended from "the higher of £4m or 25% of funds" to "the higher of £6m or 25% of funds" to accommodate the current investment of £6m. Investments in property funds are less liquid than cash investments and it would not be appropriate to withdraw funds in order to meet the 25% limit if, for example, liquid investments were used for a significant property purchase, resulting in a breach of the 25% limit.
6. The Council will give consideration to the use of "green" and "ethical" investments where appropriate and the Audit Committee will investigate their potential use.

Recommendations

7. **That Council agree:**
 - (i) **the proposed Treasury Management Strategy Statement (TMSS) for 2020/21 and the following two years,**
 - (ii) **the Annual Investment Strategy (AIS) and the Minimum Revenue Provision Statement (MRP) as contained in Sections 4 and 2.3 respectively of the report;**
 - (iii) **the Prudential Indicators contained within this report.**

Background

8. The Council applies and upholds the Chartered Institute of Public Finance and Accountancy's Code of Practice for Treasury Management in Public Services (the "CIPFA TM Code"). CIPFA has defined Treasury Management as:

"the management of the organisation's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
9. The Code requires local authorities to produce an annual Treasury Management Strategy Statement (TMSS), which documents the Council's approach to capital financing and investments for the forthcoming financial year (2020/21) and the following two years. This report fulfils that requirement.
10. In producing the TMSS, The Local Government Act 2003 (the Act) and supporting regulations require the Council to 'have regard to' the CIPFA Prudential Code and the CIPFA Treasury Management Code of Practice to set Prudential and Treasury Indicators for the next three years. The indicators are established to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
11. Additionally, the Act and its subsequent Investment Guidance require the Council to set out its treasury management strategy for borrowing, and to prepare an Annual Investment Strategy (AIS). The Council's borrowing position is reported in Section 3, with arrangements for making Minimum Revenue Provision (MRP) for repayment of debt explained in Section 2.3. The AIS is contained in Section 4 of this report, and describes the Council's policies for managing its investments, and for giving priority to the security and liquidity of those investments.
12. Statute requires that the AIS, MRP Statement, and Prudential Indicators are approved by full Council before the start of the new financial year. This has not been possible this year because of the Pandemic but will be mentioned within our Annual Governance Statement.

Policy Context

13. Providing transparency and approval of the strategies contained in this report is an important part of the Council's statutory role. Treasury Management has become increasingly topical given the nature of the world's financial markets in recent years, and Members are expected to have a basic understanding of how the Council uses its reserves and cash flows which are in the stewardship of the Head of Corporate Resources.

Other Options Considered

14. None – this report is statutorily required.

Financial Implications

15. This report has no quantifiable financial implications. Interest payable and interest receivable arising from treasury management operations, and annual revenue provisions for repayment of debt, form part of the revenue budget but are not required to support the provision of services.

Risk Management Implications

16. This report has no specific implications for the risk profile of the Authority.

Equality and Customer Service Implications

17. None.

Background Papers

None

Treasury Management Strategy Statement & Annual Investment 2020/21 to 2022/23

INTRODUCTION

Background

1. The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.
2. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.
3. The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.
4. Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

Reporting requirements

Capital Strategy

5. The CIPFA revised 2017 Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:
 - a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
 - an overview of how the associated risk is managed
 - the implications for future financial sustainability
6. The aim of this capital strategy is to ensure that all elected members on the full council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

Treasury Management reporting

7. The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals:
 - (a) **Prudential and treasury indicators and treasury strategy (this report) - the first, and most important report covers:**
 - the capital plans (including prudential indicators);

- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

The approval of the Treasury Management Strategy and Annual Investment Strategy is the function of the Council, however the Head of Corporate Resources shall also report to the Audit Committee on treasury management activity performance as follows:

- (b) **A mid year treasury management report** – This will update Members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision. The report will be submitted as soon after 30 September as practically possible.
- (c) **An annual treasury report** – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy. The report will be submitted no later than 30 September after the financial year end.
8. **Scrutiny** - The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Audit Committee, which may make recommendations regarding any aspects of treasury management policy and practices it considers appropriate in fulfilment of its scrutiny role. Such recommendations, as may be made shall be incorporated within the above named reports and submitted to meetings of the Council for consideration at the next available opportunity.
9. The Council's Scheme of Delegations is set out in Appendix E.

Treasury Management Strategy for 2020/21

10. The strategy for 2020/21 covers two main areas:
- (a) **Capital issues**
- the capital expenditure plans and the associated prudential indicators;
 - the minimum revenue provision (MRP) policy.
- (b) **Treasury management issues**
- the current treasury position;
 - treasury indicators which limit the treasury risk and activities of the Council;
 - prospects for interest rates;
 - the borrowing strategy;
 - policy on borrowing in advance of need;
 - debt rescheduling;
 - the investment strategy;
 - creditworthiness policy; and
 - policy on use of external service providers.
11. These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG MRP Guidance, the CIPFA Treasury Management Code and MHCLG Investment Guidance.

Training

12. The CIPFA Code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training. This especially applies to Members responsible for scrutiny. Training was supplied by Link Asset Services on the 2nd July 2019 and during 2020/21 appropriate mandatory treasury management training will be provided to the Audit Committee. The training needs of the treasury management officers at Adur District Council, who provide the shared treasury service to Mid Sussex District Council, are periodically reviewed. Officers attend courses provided by appropriate trainers such as CIPFA and Link Asset Services.

External Service Providers

13. The Council obtains treasury management services under a Shared Services Arrangement (SSA) from the in-house treasury management team formed out of the partnership working between Adur District and Worthing Borough Councils. The operation for all three Councils' treasury management is based at Worthing Town Hall, utilising similar banking arrangements. The SSA is provided under a Service Level Agreement (SLA) that commenced in October 2019 and which defines the respective roles of the client and provider authorities for a period of three years.
14. The SSA uses Link Asset Services as its external treasury management advisors. The Council recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources.
15. In making this arrangement the Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that reliance beyond the terms and arrangements specified in the SLA is not placed upon the shared service providers. The Council will ensure that the terms of the appointment of the shared services providers, and the methods by which their value will be assessed, are properly agreed and documented and subjected to regular review.

THE CAPITAL PRUDENTIAL INDICATORS 2020/21 – 2022/23

16. The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the Prudential Indicators, which are designed to assist Members' overview and confirm capital expenditure plans.

Capital expenditure

17. This Prudential Indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. The figures exclude other long term liabilities, such as leasing arrangements which already include borrowing instruments. Members are asked to approve the capital expenditure forecasts:

Capital expenditure £m	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
General Fund	24.626	6.253	2.232	1.989	0.161

18. The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of capital expenditure £m	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
Capital receipts	1.269	0.058	10.472	10.050	10.050
Capital grants, Contributions & S106 receipts	4.827	2.307	1.512	1.583	0.000
General Reserves, Specific Reserves & Revenue Contributions	15.939	3.888	0.248	0.356	0.111
Net financing need for the year	2.591	0.000	(10.000)	(10.000)	(10.000)

The Council's borrowing need (the Capital Financing Requirement)

19. The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life and so charges the economic consumption of capital assets as they are used.
20. The CFR includes any other long term liabilities (e.g. finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes. The Council currently has one finance lease taken out in 2018 and ending in 2028.
21. The Council is asked to approve the CFR projections below:

Capital Financing Requirement £m	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
Total CFR at 31/03	27.948	27.438	16.916	6.382	(4.615)
Movement in CFR	2.591	(0.510)	(10.522)	(10.534)	(10.547)
Movement in CFR represented by:					
Net financing need for the year (above)	3.089	0.000	(10.000)	(10.000)	(10.000)
Less MRP and other financing movements	(0.498)	(0.510)	(0.522)	(0.534)	(0.547)
Movement in CFR	2.591	(0.510)	(10.522)	(10.534)	(10.547)

Minimum revenue provision (MRP) policy statement

22. The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).
23. MHCLG regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options is provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement:
24. The Council's policy for MRP relating to unfunded capital expenditure is to provide for MRP on an annuity basis over the life of the loans (except as detailed below for the Orchard Shopping Centre). As an annuity is a fixed annual sum comprising interest and principal, the MRP for repayment of debt will increase each year over the asset life as the proportion of interest calculated on the principal outstanding reduces as the debt is repaid.
25. The purchase of the Orchard Shopping Centre head lease in November 2016 increased the Capital Financing Requirement. However, as the Council is forecasting possible capital receipts of over £30m, MRP will only be provided on the balance of nearly £5m. This will be done on a level basis of £100,000 per year.
26. Repayments included in finance leases are applied as MRP.

BORROWING

27. The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the the relevant professional codes, so that sufficient cash is available to meet the service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

Current portfolio position

28. The overall treasury management portfolio as at 31 March 2019 and for the position as at 31 December 2019 are shown below for both borrowing and investments.

	Principal at 31.03.19 £m	Actual 31.03.2019 %	Principal at 31.12.19 £m	Actual 31.12.2019 %
External Borrowing				
PWLB	(0.571)	4%	(0.505)	5%
Other Borrowing	(13.000)	79%	(7.000)	69%
Finance lease	(2.818)	17%	(2.610)	26%
TOTAL BORROWING	(16.389)	100%	(10.115)	100%
Treasury Investments:				
Local Authority Property Fund	5.942	19%	5.942	13%
In-house:				
Banks	6.010	19%	7.001	16%
Building societies - unrated	9.000	29%	17.000	38%
Building societies - rated	4.000	13%	7.000	16%
Local authorities	1.000	3%	0.000	0%
Money market funds	5.200	17%	7.735	17%
TOTAL INVESTMENTS	31.152	100%	44.678	100%
NET INVESTMENTS	14.763		34.563	

29. The Council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

External Debt £m	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
Debt at 1 April	12.698	13.571	7.437	5.298	0.152
Expected change in Debt	0.873	(6.134)	(2.139)	(5.146)	(0.152)
Other long-term liabilities (OLTL)	0.000	2.818	2.541	2.258	1.970
Expected change in OLTL	2.818	(0.277)	(0.283)	(0.288)	(0.294)
Actual gross debt at 31 March	16.389	9.978	7.556	2.122	1.676
The Capital Financing Requirement	27.948	27.438	16.916	6.382	(4.615)
Under/(over) borrowing	11.559	17.460	9.360	4.260	(1.676)

30. The Council's debt comprises one loan from the Public Works Loan Board (PWLB), which matures on 1 March 2023 and 2 loans with other local authorities, totalling £7m, which mature in November 2020 (£2m) and November 2021 (£5m), which were arranged to fund the purchase of the Orchard Shopping Centre head lease. The local authority loans are at rates lower than those that were available from the PWLB, ranging from 1.0% to 1.1% (average rate), and they will be repaid using capital receipts and maturing investments. The "other long term liability" is in respect of capital assets acquired by finance leases.

31. Within the range of Prudential Indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2020/21 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.
32. The Head of Corporate Resources reports that the Council complied with this Prudential Indicator in the current year. The respective timings of capital receipts and repayment of debt result in a projected over borrowing position in 2022/23. However this is due to the Council's ability to fund its capital expenditure from grants and other resources and is not an indication of imprudent borrowing. In addition, both the CFR and the outstanding debt are small relative to the size of the Council's budget. This view takes into account current commitments, existing plans, and the proposals in this report.

Treasury Indicators: limits to borrowing activity

33. **The operational boundary** - This is the limit which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

Operational Boundary	2019/20	2020/21	2021/22	2022/23
	£m	£m	£m	£m
Debt	£28.0m	£28.0m	£28.0m	£28.0m
Other long term liabilities	£4.0m	£4.0m	£4.0m	£4.0m
Total	£32.0m	£32.0m	£32.0m	£32.0m

34. **The authorised limit for external debt** – This is a key Prudential Indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

- (i) The Council is asked to approve the authorised limit:

Authorised Limit	2019/20	2020/21	2021/22	2022/23
	£m	£m	£m	£m
Debt	£30.0m	£30.0m	£30.0m	£30.0m
Other long term liabilities	£4.0m	£4.0m	£4.0m	£4.0m
Total	£34.0m	£34.0m	£34.0m	£34.0m

- (ii) This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

35. The Head of Corporate Resources has delegated authority, within the total limit for any individual year, to effect movement between the separately agreed limits for borrowing and other long term liabilities. Decisions will be based on the outcome of financial option appraisals and best value considerations. Any movement between these separate limits will be reported to the next meeting of the Council at the earliest opportunity.

Prospects for interest rates and the economy

36. This section contains a commentary for the economic outlook provided by the Council's shared service provider's treasury management consultants, Link Asset Services. This includes a central view of forecast interest rates as follows:

Link Asset Services Interest Rate View														
	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23
Bank Rate View	0.75	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.00	1.25	1.25	1.25	1.25
3 Month LIBID	0.70	0.70	0.70	0.80	0.90	1.00	1.00	1.00	1.10	1.20	1.30	1.30	1.30	1.30
6 Month LIBID	0.80	0.80	0.80	0.90	1.00	1.10	1.10	1.20	1.30	1.40	1.50	1.50	1.50	1.50
12 Month LIBID	1.00	1.00	1.00	1.10	1.20	1.30	1.30	1.40	1.50	1.60	1.70	1.70	1.70	1.70
5yr PWLB Rate	2.30	2.40	2.40	2.50	2.50	2.60	2.70	2.80	2.90	2.90	3.00	3.10	3.20	3.20
10yr PWLB Rate	2.60	2.70	2.70	2.70	2.80	2.90	3.00	3.10	3.20	3.20	3.30	3.30	3.40	3.50
25yr PWLB Rate	3.20	3.30	3.40	3.40	3.50	3.60	3.70	3.70	3.80	3.90	4.00	4.00	4.10	4.10
50yr PWLB Rate	3.10	3.20	3.30	3.30	3.40	3.50	3.60	3.60	3.70	3.80	3.90	3.90	4.00	4.00

37. The above forecasts have been based on an assumption that there is an agreed deal on Brexit, including agreement on the terms of trade between the UK and EU, at some point in time. The result of the general election has removed much uncertainty around this major assumption. However, it does not remove uncertainty around whether agreement can be reached with the EU on a trade deal within the short time to December 2020, as the prime minister has pledged.
38. It has been little surprise that the Monetary Policy Committee (MPC) left Bank Rate unchanged at 0.75% so far due to the ongoing uncertainty over Brexit and the outcome of the general election. In its meeting on 7 November, the MPC became more dovish due to increased concerns over the outlook for the domestic economy if Brexit uncertainties were to become more entrenched, and for weak global economic growth: if those uncertainties were to materialise, then the MPC were likely to cut Bank Rate. However, if they were both to dissipate, then rates would need to rise at a "gradual pace and to a limited extent". Brexit uncertainty has had a dampening effect on UK GDP growth in 2019, especially around mid-year. There is still some residual risk that the MPC could cut Bank Rate as the UK economy is still likely to only grow weakly in 2020 due to continuing uncertainty over whether there could effectively be a no deal Brexit in December 2020 if agreement on a trade deal is not reached with the EU. Until that major uncertainty is removed, or the period for agreeing a deal is extended, it is unlikely that the MPC would raise Bank Rate.
39. **Bond yields / PWLB rates** There has been much speculation during 2019 that the bond market has gone into a bubble, as evidenced by high bond prices and remarkably low yields. However, given the context that there have been heightened expectations that the US was heading for a recession in 2020, and a general background of a downturn in world economic growth, together with inflation generally at low levels in most countries and expected to remain subdued, conditions are ripe for low bond yields. While inflation targeting by the major central banks has been successful over the last thirty years in lowering inflation expectations, the real equilibrium rate for central rates has fallen considerably due to the high level of borrowing by consumers: this means that central banks do not need to raise rates as much now to have a major impact on consumer spending, inflation, etc. This has pulled down the overall level of interest rates and bond yields in financial markets over the last thirty years. We have therefore seen over the last year, many bond yields up to ten years in the Eurozone actually turn negative. In addition, there has, at times, been an inversion of bond yields in the US whereby ten-year yields have fallen below shorter-term yields. In the past, this has been a precursor of a recession. The other side of this coin is that bond prices are elevated, as investors would be expected to be moving out of riskier assets i.e. shares, in anticipation of a downturn in corporate earnings and so selling out of equities. However, stock markets are also currently at high levels as some investors have focused on chasing returns in the context of dismal ultra-low interest rates on cash deposits.

40. During the first half of 2019-20 to 30 September, gilt yields plunged and caused a near halving of longer term PWLB rates to completely unprecedented historic low levels. (See paragraph 3.7 for comments on the increase in the PWLB rates margin over gilt yields of 100bps introduced on 9 October 2019.) There is though, an expectation that financial markets have gone too far in their fears about the degree of the downturn in US and world growth. If, as expected, the US only suffers a mild downturn in growth, bond markets in the US are likely to sell off and that would be expected to put upward pressure on bond yields, not only in the US, but also in the UK due to a correlation between US treasuries and UK gilts; at various times this correlation has been strong but at other times weak. However, forecasting the timing of this, and how strong the correlation is likely to be, is very difficult to forecast with any degree of confidence. Changes in UK Bank Rate will also impact on gilt yields.
41. One potential danger that may be lurking in investor minds is that Japan has become mired in a twenty-year bog of failing to get economic growth and inflation up off the floor, despite a combination of massive monetary and fiscal stimulus by both the central bank and government. Investors could be fretting that this condition might become contagious to other western economies.
42. Another danger is that unconventional monetary policy post 2008, (ultra-low interest rates plus quantitative easing), may end up doing more harm than good through prolonged use. Low interest rates have encouraged a debt-fuelled boom that now makes it harder for central banks to raise interest rates. Negative interest rates could damage the profitability of commercial banks and so impair their ability to lend and / or push them into riskier lending. Banks could also end up holding large amounts of their government's bonds and so create a potential doom loop. (A doom loop would occur where the credit rating of the debt of a nation was downgraded which would cause bond prices to fall, causing losses on debt portfolios held by banks and insurers, so reducing their capital and forcing them to sell bonds – which, in turn, would cause further falls in their prices etc.). In addition, the financial viability of pension funds could be damaged by low yields on holdings of bonds.
43. The overall longer run future trend is for gilt yields, and consequently PWLB rates, to rise, albeit gently. From time to time, gilt yields, and therefore PWLB rates, can be subject to exceptional levels of volatility due to geo-political, sovereign debt crisis, emerging market developments and sharp changes in investor sentiment. Such volatility could occur at any time during the forecast period.
44. In addition, PWLB rates are subject to ad hoc decisions by H.M. Treasury to change the margin over gilt yields charged in PWLB rates: such changes could be up or down. It is not clear that if gilt yields were to rise back up again by over 100bps within the next year or so, whether H M Treasury would remove the extra 100 bps margin implemented on 9 October 2019.
45. Economic and interest rate forecasting remains difficult with so many influences weighing on UK gilt yields and PWLB rates. The above forecasts, (and MPC decisions), will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the EU, could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments.

Investment and borrowing rates

46. Investment returns are likely to remain low during 2020/21 with little increase in the following two years. However, if major progress was made with an agreed Brexit, then there is upside potential for earnings.

47. Borrowing interest rates were on a major falling trend during the first half of 2019-20 but then jumped up by 100 bps on 9 October 2019. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the last few years. However, the unexpected increase of 100 bps in PWLB rates requires a major rethink of local authority treasury management strategy and risk management. Now that the gap between longer term borrowing rates and investment rates has materially widened, and in the long term Bank Rate is not expected to rise above 2.5%, it is unlikely that this authority will do any further longer term borrowing for the next three years, or until such time as the extra 100 bps margin is removed
48. If this authority is not able to avoid borrowing to finance new capital expenditure, there will be a cost of carry, (the difference between higher borrowing costs and lower investment returns), to any new short or medium-term borrowing that causes a temporary increase in cash balances as this position will, most likely, incur a revenue cost.

Borrowing strategy

49. The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.
50. Against this background and the risks within the economic forecast, caution will be adopted with the 2020/21 treasury operations. The Head of Corporate Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:
- (i) if it was felt that there is a significant risk of a sharp FALL in borrowing rates, (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then borrowing will be postponed.
 - (ii) if it was felt that there is a significant risk of a much sharper RISE in borrowing rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity, or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

Any decisions will be reported to the appropriate decision making body at the next available opportunity.

Policy on borrowing in advance of need

51. The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds. Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism

Debt rescheduling

52. The Council has one loan from the Public Works Loan Board, repaid by fixed annuities over the life of the loan. As it would not be possible to prematurely repay the existing loan without incurring a premium charge for early settlement, there is currently no intention to redeem the loan early. The loans for the purchase of the Orchard Shopping Centre head lease will be repaid within 2 years and are at competitively low interest rates.

53. Any rescheduling will be reported to the Council at the earliest meeting following its action.

New financial institutions as a source of borrowing and / or types of borrowing

54. Following the decision by the PWLB on 9 October 2019 to increase their margin over gilt yields by 100 bps to 180 basis points on loans lent to local authorities, if any borrowing becomes necessary, consideration will also need to be given to sourcing funding at cheaper rates from the following:

Local authorities (primarily shorter dated maturities)

Financial institutions (primarily insurance companies and pension funds but also some banks, out of spot or forward dates)

Municipal Bonds Agency

55. The degree which any of these options proves cheaper than PWLB Certainty Rate is still evolving at the time of writing but our advisors will keep us informed.

ANNUAL INVESTMENT STRATEGY

Investment policy – management of risk

56. The Council's investment policy has regard to the following: -
- MHCLG's Guidance on Local Government Investments ("the Guidance")
 - CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 ("the Code")
 - CIPFA Treasury Management Guidance Notes 2018
57. The Council's investment priorities will be security first, portfolio liquidity second and then yield, (return).
58. The Head of Corporate Resources, under delegated powers, will undertake through the Shared Service Arrangement the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements, and Prudential Indicators. As conditions in the financial markets remain uncertain, the proposed maximum limits for Specified and Unspecified Investments for 2020/21 are the same as for 2019/20.
59. Investment instruments identified for use in the financial year are listed in Appendices C and D under the 'specified' and 'non-specified' investments categories. Counterparty limits will be as set through the Council's treasury management practices.
60. The above guidance from the MHCLG and CIPFA place a high priority on the management of risk. This authority has adopted a prudent approach to managing risk and defines its risk appetite by the following means: -
- (i) Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
 - (ii) Other information: ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.

- (iii) Other information sources used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
 - (iv) This authority has defined the list of types of investment instruments that the treasury management team is authorised to use. There are two lists in Appendices C and D under the categories of 'specified' and 'non-specified' investments.
 - **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year.
 - **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use. Once an investment is classed as non-specified, it remains non-specified all the way through to maturity i.e. an 18 month deposit would still be non-specified even if it has only 11 months left until maturity.
 - (v) Lending limits, (amounts and maturity), for each counterparty are set out in Appendices C and D.
 - (vi) This authority will set a limit for the amount of its investments which are invested for longer than 365 days, (see paragraph 4.8).
 - (vii) Investments will only be placed with counterparties from countries with a specified minimum sovereign rating, (see paragraph 4.5). The UK is excluded from this limit because it will be necessary to invest in UK banks and other institutions even if the sovereign rating is cut.
 - (viii) Through the shared service, this authority has access to external consultants, to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
 - (ix) All investments will be denominated in sterling.
 - (x) As a result of the change in accounting standards for 2019/20 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the Ministry of Housing, Communities and Local Government, [MHCLG], concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years commencing from 1.4.18. Consequently any fluctuations in the value of the Council's investment in the Local Authorities' Property Fund will not be taken through the general fund for the period of the override).
61. However, this authority will also pursue **value for money** in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance, (see paragraph 4.14). Regular monitoring of investment performance will be carried out during the year.

Changes in risk management policy from last year

62. The above criteria are unchanged from last year other than as set out in the Summary at the beginning of the report.

Creditworthiness policy

63. The primary principle governing the Council's investment criteria through the Shared Services Arrangement (SSA) is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the SSA will ensure that:
- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in the specified and non-specified investment sections in Appendices C and D; and
 - It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's Prudential Indicators covering the maximum principal sums invested.
64. The SSA will maintain a counterparty list in compliance with the criteria in the Appendices and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.
65. Credit rating information is supplied to the SSA by Link Asset Services, our treasury advisors, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating Watches (notification of a likely change), rating Outlooks (notification of the longer term bias outside the central rating view) are provided to the SSA almost immediately after they occur and this information is considered before dealing. For instance, a negative rating Watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.

Use of additional information other than credit ratings

66. Additional requirements under the Code require the Council to supplement credit rating information. Whilst the above criteria rely primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information will be applied to compare the relative security of differing investment opportunities.
67. The officers of the shared service recognise that ratings should not be the sole determinant of the quality of an institution and that it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets, the government support for banks, and the credit ratings of that government support. Accordingly, the shared service will exercise discretion to deviate from Link's suggested durational bands – for example the Council approves the use of Building Societies as set out in the Appendices.

The Council's Minimum Investment Creditworthiness Criteria

68. The minimum credit ratings criteria used by the Council generally will be a short term rating (Fitch or equivalents) of F1, and long term rating A-. There may be occasions when the counterparty ratings from one or more of the three Ratings Agencies are marginally lower than the minimum requirements of F1 Short term, A- Long term (or equivalent). Where this arises, the counterparties to which the ratings apply may still be used with discretion, but in these instances consideration will be given to the whole range of topical market information available, not just ratings.
69. The Council includes **Building Societies** with asset size in excess of £1 billion in the specified investments. It is recognised that they may carry a lower credit rating than the Council's other counterparties, or no rating, therefore the lending limits for the building societies shall be £4m each for the top 3 and £3m for the others.

UK banks – ring fencing

70. The largest UK banks, (those with more than £25bn of retail / Small and Medium-sized Enterprise (SME) deposits), are required, by UK law, to separate core retail banking services from their investment and international banking activities by 1st January 2019. This is known as “ring-fencing”. Whilst smaller banks with less than £25bn in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.
71. Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking, in order to improve the resilience and resolvability of banks by changing their structure. In general, simpler activities offered from within a ring-fenced bank, (RFB), will be focused on lower risk, day-to-day core transactions, whilst more complex and “riskier” activities are required to be housed in a separate entity, a non-ring-fenced bank, (NRFB). This is intended to ensure that an entity's core activities are not adversely affected by the acts or omissions of other members of its group.
72. While the structure of the banks included within this process may have changed, the fundamentals of credit assessment have not. The Council will continue to assess the new-formed entities in the same way that they do others and those with sufficiently high ratings, (and any other metrics considered), will be considered for investment purposes.

Country Limits and Proposed Monitoring Arrangements

73. Due care will be taken to consider the country, group and sector exposure of the Council's investments. The SSA has determined that it will only use approved counterparties from countries (other than the UK) with a minimum sovereign credit rating of AA- from Fitch Ratings (or equivalent from other agencies if Fitch does not provide one). The list of countries that qualify using these credit criteria as at the date of this report is reflected in the counterparty approved lending list shown at Appendix C. This list will be added to, or deducted from, by officers should ratings change, in accordance with this policy. No more than 25% of investments shall be placed in non-UK financial institutions for more than 7 days.

Investment strategy

74. **In-house funds** - Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed. For cash flow balances, the shared service will seek to use notice accounts, money market funds and short-dated deposits to benefit from the compounding of interest
- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
 - Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.
75. The Head of Corporate Resources, through the shared service, will undertake the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements and Prudential Indicators. Decisions taken on the core investment portfolio will be reported to the meetings of the Audit Committee and the Council in accordance with the reporting arrangements. The Council's shared service will research the range of "green" and "ethical" investments that is developing.

Investment returns expectations

76. On the assumption that the UK and EU agree a Brexit deal including the terms of trade by the end of 2020 or soon after, then Bank Rate is forecast to increase only slowly over the next few years, to reach 1.25% by quarter 1 2023. Bank Rate forecasts are:

Q1 2021	:	0.75%
Q1 2022	:	1.00%
Q1 2023	:	1.25%

77. The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows:

2019/20	:	0.75%
2020/21	:	0.75%
2021/22	:	1.00%
2022/23	:	1.25%
2023/24	:	1.50%
2024/25	:	1.75%
Later years	:	2.25%

- The overall balance of risks to economic growth in the UK is probably relatively even due to the weight of all the uncertainties over post-Brexit trade arrangements and the impact of an expansionary government spending policy (as expected in the Budget on the 11th March).
- The balance of risks to increases or decreases in Bank Rate and shorter term PWLB rates are also broadly even.

Funds available for investment

78. The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances.

Investments	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
	£m	£m	£m	£m
Balance at 1 April	31.152	31.000	39.895	48.182
Capital Expenditure	(6.253)	(2.232)	(1.989)	(0.161)
Grants, capital receipts & other new funds	2.365	13.127	15.276	11.298
Loan repayments/adjustments	3.736	(2.000)	(5.000)	0.000
Balance at 31 March	31.000	39.895	48.182	59.319

Investment treasury indicator and limit - principal funds invested for greater than 365 days

79. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

80. The Council is asked to approve the treasury indicator limit: -

Maximum proportion of principal sums invested > 365 days	2020/21	2021/22	2022/23
Principal sums invested > 365 days	50%	50%	50%

81. In any sustained period of significant stress in the financial markets, the default position is for investments to be placed with The Debt Management Account Deposit Facility of the Debt Management Office (DMO) of the UK central government. The rates of interest are below equivalent money market rates, however, the returns are an acceptable trade-off for the guarantee that the Council's capital is secure.

82. The Council's proposed investment activity for placing cash deposits in 2019/20 will be to use:

- AAA-rated Money Market Funds with a Constant Net Asset Value (CNAV) or a Low Volatility Net Asset Value (LVNAV) under the new money market fund regulations
- other local authorities, parish councils etc.
- bank business reserve accounts and term deposits. These are primarily restricted to UK institutions that are rated at least A- long term.
- Building Societies with asset size in excess of £1 billion

Other Options for Longer Term Investments

83. To provide the Council with options to enhance returns above those available for short term durations, it is proposed to retain the option to use the following for longer term investments, as an alternative to cash deposits:

- a) **Supranational bonds** greater than 1 year to maturity

- b) **Gilt edged securities** with a maturity of greater than one year. These are Government bonds and so provide the highest security of interest and the repayment of principal on maturity. Similar to category (a) above, the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.
- c) **Building Societies** not meeting the basic security requirements under the specified investments, but on the list in Appendix C (b). The operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings.
- d) Any **bank** that has a minimum long term credit rating of A- for deposits with a maturity of greater than one year (including forward deals in excess of one year from inception to repayment).
- e) Any **non-rated subsidiary** of a credit rated institution included in the specified investment category. These institutions will be included as an investment category subject to a guarantee from the parent company, and exposure up to the limit applicable to the parent.
- g) **Property Investment Funds** for example the Local Authorities' Property Fund. The Councils will consult the Treasury Management Advisors and undertake appropriate due diligence before investment of this type is undertaken. Some of these funds are deemed capital expenditure – the Councils will seek guidance on the status of any fund considered for investment.
- h) Other **local authorities**, parish councils etc.
- i) Other investments listed in Appendices C and D - the Council will seek further advice on the appropriateness and associated risks with investments in these other categories as and when an opportunity presents itself.

The **accounting treatment** may differ from the underlying cash transactions arising from investment decisions made by the Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, the accounting implications of new transactions will be reviewed before they are undertaken.

The Council will not transact in any investment that may be deemed to constitute capital expenditure (e.g. Share Capital, or pooled investment funds other than Money Market Funds), without the resource implications being approved as part of the consideration of the Capital Programme or other appropriate Committee report.

Investment risk benchmarking – The shared service will subscribe to Link's Investment Benchmarking Club to review the investment performance and risk of the portfolios.

At the end of the financial year the Council will report on investment activity as part of the Annual Treasury Report.

External fund managers

The Council does not use external fund managers, but reserves the option to do so in future should this be deemed to be appropriate. Should consideration be given to exercising this option in the future, the relevant Committee will be advised of the reasons for doing so and the Council requested to consider whether it wishes to proceed with the selection and appointment of external fund managers.

The monitoring of investment counterparties – The credit rating of counterparties will be monitored regularly. The shared service receives credit rating information (changes, rating watches and rating outlooks) from Link Asset Services as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already

been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the shared service, and if required, new counterparties which meet the criteria will be added to the list.

Officers of the shared service met in January with representatives of the Local Authorities' Property Fund for a presentation on the activity and outlook of the Fund to supplement the regular reports and dividend statements.

THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2020/21 – 2022/23

- 1.1 The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the Prudential Indicators, which are designed to assist Members' overview and confirm capital expenditure plans.

Capital expenditure	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
	£m	£m	£m	£m	£m
General Fund	24.626	6.253	2.232	1.989	0.161

1.2 **Affordability Prudential Indicators**

The previous sections cover the overall capital and control of borrowing Prudential Indicators, but within this framework Prudential Indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators:

Ratio of financing costs to net revenue stream

This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

	2018/19 Actual	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
	%	%	%	%	%
Ratio	0.50%	0.58%	0.39%	-1.04%	-3.07%

The estimates of financing costs include current commitments and the proposals in this budget report.

1.3 **Maturity structure of borrowing**

These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits. However as the Council currently has only two significant loans, the upper limits need to be set very high. The Council does not have any variable rate borrowing.

The Council is asked to approve the following treasury indicators and limits:

Maturity structure of fixed interest rate borrowing 2020/21		
	Lower	Upper
Under 12 months	0%	50%
12 months to 2 years	0%	70%
2 years to 5 years	0%	80%
5 years to 10 years	0%	80%
Over 10 years	0%	60%

TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT

The MHCLG issued Investment Guidance in 2018, and this forms the structure of the Council's policy below. These guidelines do not apply to either trust funds or pension funds which operate under a different regulatory regime.

The key intention of the Guidance is to maintain the current requirement for councils to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires this Council to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes, which will apply to all investment activity. In accordance with the Code, the Council will comply with the treasury management practices (TMPs). This part, TMP 1(1), covering investment counterparty policy requires approval each year.

Annual investment strategy - The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of the annual treasury strategy for the following year, covering the identification and approval of the following:

- The strategy guidelines for choosing and placing investments, particularly non-specified investments.
- The principles to be used to determine the maximum periods for which funds can be committed.
- Specified investments that the Council will use. These are high security (i.e. high credit rating, although this is defined by the Council, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year.
- Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

Strategy guidelines – The main strategy guidelines are contained in the body of the treasury strategy statement.

SPECIFIED AND NON SPECIFIED INVESTMENTS

Specified Investments will be those that meet the criteria in the MHCLG Guidance, i.e. the investment

- is sterling denominated
- has a maximum maturity of 1 year or where the Council has the right to be repaid within 12 months
- meets the “high” credit criteria as determined by the Council or is made with the UK government or is made with a local authority in England, Wales and Scotland.
- the making of which is not defined as capital expenditure under section 25(1)(d) in SI 2003 No 3146 (i.e. the investment is not loan capital or share capital in a body corporate).

These are considered low risk assets where the possibility of loss of principal or investment income is small.

“Specified” Investments identified for the Council’s use are:

- The UK Government such as the Debt Management Account deposit facility
 - Deposits with UK local authorities
 - Deposits with banks and building societies
 - *Certificates of deposit with banks and building societies
 - *Gilts : (bonds issued by the UK government)
 - *Bonds issued by multilateral development banks
 - Pooled investment vehicles such as AAA Money Market Funds with a Constant Net Asset Value (Constant NAV) or appropriate Low Volatility Net Asset Value (LVNAV) that have been awarded an AAA rating by Standard and Poor’s, Moody’s and/or Fitch rating agencies.
 - Other Money Market Funds and Collective Investment Schemes– i.e. credit rated funds which meet the definition of a collective investment scheme as defined in SI 2004 No 534 and SI 2007 No 573.
- * Investments in these instruments will be on advice from the Shared Service’s treasury advisor.

For credit rated counterparties, the minimum criteria, excepting for the Council’s own banker and the specified building societies, (see below) will be the short-term / long-term ratings assigned by various agencies which may include Moody’s Investors Services, Standard and Poor’s, Fitch Ratings, being:

Long-term investments (over 365 days): minimum: A- (Fitch) or equivalent

Or

Short-term investments (365 days or less): minimum: F1 (Fitch) or equivalent

For all investments the Shared Service will also take into account information on corporate developments of, and market sentiment towards, investment counterparties.

If the Council’s own banker (currently Lloyds Bank) falls beneath the specified criteria, it will still be used for transactional purposes.

Within these bodies, and in accordance with the Code, the Council has set additional criteria to set the time and amount of monies which will be invested in these bodies, as detailed below.

APPROVED INVESTMENT INSTITUTIONS**Specified Investments identified for use by the Council**

New specified investments will be made within the following limits:

(a) Banks

Major U.K. and European Banks and their wholly-owned subsidiaries meeting the Council's approved investment criteria. RFB refers to Ring Fenced Bank – the separate core retail banking service.

	Counterparty	Group	Maximum Sum	Maximum Period *
1	HSBC UK Bank PLC (RFB)	N/A	£4m	5 years
2	The Royal Bank of Scotland Group: The Royal Bank of Scotland PLC (RFB) National Westminster Bank PLC (RFB)	£5m		
			£4m	5 years
			£4m	5 years
3	Lloyds Group:: Lloyds Bank PLC (RFB) Bank of Scotland PLC (RFB)	£5m		
			£4m	5 years
			£4m	5 years
4	Barclays Bank UK PLC (RFB)	N/A	£4m	5 years
5	Santander UK PLC	N/A	£4m	5 years
6	Clydesdale Bank PLC	N/A	£4m	5 years
7	Handelsbanken PLC	N/A	£4m	1 year
8	Goldman Sachs International Bank	N/A	£4m	5 years
9	Close Brothers Ltd	N/A	£4m	5 years

*Specified investments are for a maximum period of 1 year, the maximum limits shown in this column are for non-specified investments with these institutions.

(b) Building Societies

Building Societies (Assets in excess of £1 billion):

Rank	Name of Counterparty	Individual	
		Sum	Period*
1	Nationwide	£4m	3 years
2	Coventry	£4m	3 years
3	Yorkshire	£4m	3 years
4	Skipton	£3m	3 years
5	Leeds	£3m	3 years
6	Principality	£3m	3 years
7	West Bromwich	£3m	3 years
8	Nottingham	£3m	3 years
9	Newcastle	£3m	3 years
10	Cumberland	£3m	3 years
11	National Counties	£3m	3 years
12	Progressive	£3m	3 years
13	Cambridge	£3m	3 years
14	Newbury	£3m	3 years
15	Monmouthshire	£3m	3 years
16	Leek United	£3m	3 years
17	Saffron	£3m	3 years

*Specified investments are for a maximum period of 1 year, the maximum limits shown in this column are for non-specified investments with these institutions.

(c) Money Market Funds

Counterparty	Sum	For Short Term Operational Cash Flow Purposes
Invesco Aim – Sterling	£3m	
Blackrock Institutional Sterling Liquidity Fund	£3m	
Goldman Sachs Sterling Liquidity Reserve Fund	£3m	
Fidelity Institutional Cash Fund plc – Sterling	£3m	
CCLA Public Sector Deposit Fund	£3m	
JP Morgan GBP Liquidity LVNAV Fund	£3m	
Federated Short-Term Sterling Prime Liquidity Fund	£3m	

The limit for investing in any one Money Market Fund is £3 million. Total investments in Money Market Funds shall not exceed the higher of £9m or 25% of the total investment portfolio, for more than one week at any one time.

(d) Local Authorities

All the following local authorities mentioned in the Regulations

Schedule Part II Ref	Details	Individual	
		Sum	Period*
1	County Councils (England and Wales)	£3m	5 years
2	District Councils in England and Wales (including Borough, City, Metropolitan Borough Councils and Unitary Councils)	£3m	5 years
3	London Borough Councils	£3m	5 years
4	The Common Council of the City of London	£3m	5 years
5	The Council for the Isles of Scilly	£3m	5 years
7	Combined Police Authorities	£3m	5 years
16	Regional, Islands, or District Councils in Scotland	£3m	5 years
17	Joint boards under s.235 (1) of LG (Scotland) Act 1973	£3m	5 years
28	District Councils in Northern Ireland	£3m	5 years
29	Police Authorities (now Police and Crime Commissioners) under s.3 Police Act 1964 as substituted by s.2 Police & Magistrates Courts Act 1994	£3m	5 years

*Specified investments are for a maximum period of 1 year, the maximum limits shown in this column are for non-specified investments with these institutions.

NON-SPECIFIED INVESTMENTS DETERMINED FOR USE BY THE COUNCIL

Having considered the rationale and risk associated with Non-Specified Investments, the following have been determined for the Council's use.

	In-house use	Use by Fund Managers	Maximum Maturity	Maximum % of portfolio or £m	Capital Expenditure?
<ul style="list-style-type: none"> • Deposits with banks and building societies and Local Authorities • Certificates of deposit with banks and building societies 	√		5 years	The higher of £10m or 50% of funds	No
Gilts and Bonds: <ul style="list-style-type: none"> • Gilts • Bonds issued by multilateral development banks • Bonds issued by financial institutions guaranteed by the UK government • Sterling denominated bonds by non-UK sovereign governments 	√ √ √ (on advice from treasury advisor)	√ √ √ √	5 years	The higher of £3m or 25% of funds	No
Money Market Funds and Collective Investment Schemes (pooled funds which meet the definition of a collective investment scheme as defined in SI 2004 No. 534 and SI 2007, No. 573), but which are not credit rated.	√ (on advice from treasury advisor)	√	These funds do not have a defined maturity date.	The higher of £9m or 25% of funds	No
Government guaranteed bonds and debt instruments (e.g. floating rate notes) issued by corporate bodies	√ (on advice from treasury advisor)	√	5 years	The higher of £2m or 10% of funds	Subject to test
Property Funds approved by HM Treasury and operated by managers regulated by the Financial Conduct Authority – specifically the Local Authorities' Property Fund	√	√	These funds do not have a defined maturity date.	The higher of £6m or 25% of funds	No
Non-guaranteed bonds and debt instruments (e.g. floating rate notes) issued by corporate bodies	√ (on advice from treasury advisor)	√	5 years	The higher of £2m or 10% of funds	Subject to test
Collective Investment Schemes (pooled funds) which do not meet the definition of collective investment schemes in SI 2004 No. 534 or SI 2007, No. 573.	√ (on advice from treasury advisor)	√	These funds do not have a defined maturity date	The higher of £2m or 20% of funds	Subject to test

In determining the period to maturity of an investment, the investment is regarded as commencing on the date of the commitment of the investment rather than the date on which funds are paid over to the counterparty.

The Council will seek further advice on the appropriateness and associated risks with investments in these categories.

Accounting treatment of investments

The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

TREASURY MANAGEMENT SCHEME OF DELEGATION**(i) Full Council**

- approval of annual treasury management strategy and Annual Investment Strategy
- approval of MRP Statement
- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices
- budget consideration and approval
- approval of the division of responsibilities

(ii) Audit Committee

Receiving and reviewing the following, and making recommendations to the Cabinet

- regular monitoring reports on compliance with the Treasury Management Strategy, practices and procedures.
- receiving and reviewing regular monitoring reports and acting on recommendations

(iii) The S151 (responsible) officer

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance
- submitting regular treasury management policy reports
- submitting budgets and budget variations
- receiving and reviewing management information reports
- reviewing the performance of the treasury management function
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function
- ensuring the adequacy of internal audit, and liaising with external audit
- approving the selection of external service providers and agreeing terms of appointment.

ECONOMIC BACKGROUND

UK. Brexit. 2019 was a year of upheaval on the political front as Theresa May resigned as Prime Minister to be replaced by Boris Johnson on a platform of the UK leaving the EU on 31 October 2019, with or without a deal. However, MPs blocked leaving on that date and the EU agreed an extension to 31 January 2020. In late October, MPs approved an outline of a Brexit deal to enable the UK to leave the EU on 31 January. The Conservative Government gained a large overall majority in the **general election** on 12 December; this ensured that the UK left the EU on 31 January. However, there will still be much uncertainty as the detail of a comprehensive trade deal will need to be negotiated by the current end of the transition period in December 2020, which the Prime Minister has pledged he will not extend. This could prove to be an unrealistically short timetable for such major negotiations that leaves open three possibilities; a partial agreement on many areas of agreement and then continuing negotiations to deal with the residual areas, the need for the target date to be put back, probably two years, or, a no deal Brexit in December 2020.

GDP growth took a big hit from both political and Brexit uncertainty during 2019; quarter three 2019 surprised on the upside by coming in at +0.4% q/q, +1.1% y/y. However, the peak of Brexit uncertainty during the final quarter appears to have suppressed quarterly growth to probably around zero. The forward-looking surveys in January have indicated that there could be a significant recovery of growth now that much uncertainty has gone. Nevertheless, economic growth may only come in at about 1% in 2020, pending the outcome of negotiations on a trade deal. Provided there is a satisfactory resolution of those negotiations, which are in both the EU's and UK's interest, then growth should strengthen further in 2021.

At its 30 January meeting, the Monetary Policy Committee held Bank Rate unchanged at 0.75%. The vote was again split 7-2, with two votes for a cut to 0.50%. The financial markets had been predicting a 50:50 chance of a rate cut at the time of the meeting. Admittedly, there had been plenty of downbeat UK economic news in December and January which showed that all the political uncertainty leading up to the general election, together with uncertainty over where Brexit would be going after the election, had depressed economic growth in quarter 4. In addition, three members of the MPC had made speeches in January which were distinctly on the dovish side, flagging up their concerns over weak growth and low inflation; as there were two other members of the MPC who voted for a rate cut in November, five would be a majority at the January MPC meeting if those three followed through on their concerns.

However, that downbeat news was backward looking; more recent economic statistics and forward-looking business surveys, have all pointed in the direction of a robust bounce in economic activity and a recovery of confidence after the decisive result of the general election removed political and immediate Brexit uncertainty. In addition, the September spending round increases in expenditure will start kicking in from April 2020, while the Budget in March is widely expected to include a substantial fiscal boost by further increases in expenditure, especially on infrastructure. The Bank of England cut its forecasts for growth from 1.2% to 0.8% for 2020, and from 1.8% to 1.4% for 2021. However, these forecasts could not include any allowance for the predicted fiscal boost in the March Budget. Overall, the MPC clearly decided to focus on the more recent forward-looking news than the earlier downbeat news.

The quarterly Monetary Policy Report did, though, flag up that there was still a risk of a Bank Rate cut; "Policy may need to reinforce the expected recovery in UK GDP growth should the more positive signals from recent indicators of global and domestic activity not be sustained or should indicators of domestic prices remain relatively weak." Obviously, if trade negotiations with the EU failed to make satisfactory progress, this could dampen confidence and growth. On the other hand, there was also a warning in the other direction, that if growth were to pick up strongly, as suggested by recent business surveys, then "some modest tightening" of policy might be needed further ahead. It was therefore notable that the Bank had dropped its phrase that tightening would be "limited and gradual", a long-standing piece of forward guidance; this gives the MPC more room to raise Bank Rate more quickly if growth was to surge and, in turn, lead to a surge in inflation above the 2% target rate.

As for **inflation** itself, CPI has been hovering around the Bank of England's target of 2% during 2019, but fell again in both October and November to a three-year low of 1.5% and then even further to 1.3% in December. It is likely to remain close to or under 2% over the next two years and so, it does not pose any immediate concern to the MPC at the current time. However, if there was a hard or no deal Brexit, inflation could rise towards 4%, primarily because of imported inflation on the back of a weakening pound.

With regard to the **labour market**, growth in numbers employed has been quite resilient through 2019 until the three months to September, where it fell by 58,000. However, there was an encouraging pick up again in the three months to October to growth of 24,000 and then a stunning increase of 208,000 in the three months to November. The unemployment rate held steady at a 44-year low of 3.8% on the Independent Labour Organisation measure. Wage inflation has been steadily falling from a high point of 3.9% in July to 3.4% in November (3-month average regular pay, excluding bonuses). This meant that in real terms, (i.e. wage rates higher than CPI inflation), earnings grew by about 2.1%. As the UK economy is very much services sector driven, an increase in household spending power is likely to feed through into providing some support to the overall rate of economic growth in the coming months. The other message from the fall in wage growth is that employers are beginning to find it easier to hire suitable staff, indicating that supply pressure in the labour market is easing.

Coronavirus. The recent Coronavirus outbreak could cause disruption to the economies of affected nations. The Chinese economy is now very much bigger than it was at the time of the SARS outbreak in 2003 and far more integrated into world supply chains. However, a temporary dip in Chinese growth could lead to a catch up of lost production in following quarters with minimal net overall effect over a period of a year. However, no one knows quite how big an impact this virus will have around the world; hopefully, the efforts of the WHO and the Chinese authorities will ensure that the current level of infection does not multiply greatly.

USA. After growth of 2.9% y/y in 2018 fuelled by President Trump's massive easing of fiscal policy, growth has weakened in 2019. After a strong start in quarter 1 at 3.1%, (annualised rate), it fell to 2.0% in quarter 2 and then 2.1% in quarters 3 and 4. This left the rate for 2019 as a whole at 2.3%, a slowdown from 2018 but not the precursor of a recession which financial markets had been fearing earlier in the year. Forward indicators are currently indicating that growth is likely to strengthen somewhat moving forward into 2020.

The Fed finished its series of increases in rates to 2.25 – 2.50% in December 2018. In July 2019, it cut rates by 0.25% as a 'midterm adjustment'. It also ended its programme of quantitative tightening in August 2019, (reducing its holdings of treasuries etc.). It then cut rates by 0.25% again in September and by another 0.25% in its October meeting to 1.50 – 1.75%. It left rates unchanged at its December meeting. Rates were again left unchanged at its end of January meeting although it had been thought that as the yield curve on Treasuries had been close to inverting again, (with 10 year yields nearly falling below 2 year yields - this is often viewed as being a potential indicator of impending recession), that the Fed could have cut rates, especially in view of the threat posed by the coronavirus. However, it acknowledged that coronavirus was a threat of economic disruption but was not serious at the current time for the USA. In addition, the phase 1 trade deal with China is supportive of growth. The Fed though, does have an issue that despite reasonably strong growth rates, its inflation rate has stubbornly refused to rise to its preferred core inflation target of 2%; it came in at 1.6% in December. It is therefore unlikely to be raising rates in the near term. It is also committed to reviewing its approach to monetary policy by midyear 2020; this may include a move to inflation targeting becoming an average figure of 2% so as to allow more flexibility for inflation to under and over shoot.

"The NEW NORMAL." The Fed chairman has given an overview of the current big picture of the economy by summing it up as **A NEW NORMAL OF LOW INTEREST RATES, LOW INFLATION AND PROBABLY LOWER GROWTH.** This is indeed an affliction that has mired Japan for the last two decades despite strenuous efforts to stimulate growth and inflation by copious amounts of fiscal stimulus and cutting rates to zero. China and the EU are currently facing the same difficulty to trying

to get inflation and growth up. Our own MPC may well have growing concerns and one MPC member specifically warned on the potential for a low inflation trap in January. It is also worth noting that no less than a quarter of total world sovereign debt is now yielding negative returns.

EUROZONE. Growth has been slowing from +1.8 % during 2018 to nearly half of that in 2019. Growth was +0.4% q/q in quarter 1, +0.2% q/q in quarters 2 and 3; it then fell to +0.1% in quarter 4 for a total overall growth rate of only 1.0% in 2019. Recovery from quarter 4 is expected to be slow and gradual. German GDP growth has been struggling to stay in positive territory in 2019 and grew by only 0.6% in 2019, with quarter 4 potentially being a negative number. Germany would be particularly vulnerable to a no deal Brexit depressing exports further and if President Trump imposes tariffs on EU produced cars.

The European Central Bank (ECB) ended its programme of quantitative easing purchases of debt in December 2018, which then meant that the central banks in the US, UK and EU had all ended the phase of post financial crisis expansion of liquidity supporting world financial markets by quantitative easing purchases of debt. However, the downturn in EZ growth in the second half of 2018 and in 2019, together with inflation falling well under the upper limit of its target range of 0 to 2%, (but it aims to keep it near to 2%), has prompted the ECB to take new measures to stimulate growth. At its March 2019 meeting, it said that it expected to leave interest rates at their present levels “at least through to the end of 2019”, but that was of little help to boosting growth in the near term. Consequently, it announced a **third round of TLTROs**; this provides banks with cheap borrowing every three months from September 2019 until March 2021 that means that, although they would have only a two-year maturity, the Bank was making funds available until 2023, two years later than under its previous policy. As with the last round, the new TLTROs will include an incentive to encourage bank lending, and they will be capped at 30% of a bank’s eligible loans. However, since then, the downturn in EZ and world growth has gathered momentum; at its meeting on 12 September, it cut its deposit rate further into negative territory, from -0.4% to -0.5%, and announced a **resumption of quantitative easing purchases of debt for an unlimited period**. At its October meeting it said these purchases would start in November at €20bn per month - a relatively small amount compared to the previous buying programme. It also increased the maturity of the third round of TLTROs from two to three years. However, it is doubtful whether this loosening of monetary policy will have much impact on growth and, unsurprisingly, the ECB stated that governments would need to help stimulate growth by ‘growth friendly’ fiscal policy. There have been no changes in rates or monetary policy since October. In January, the ECB warned that the economic outlook was ‘tilted to the downside’ and repeated previous requests for governments to do more to stimulate growth by increasing national spending. The new President of the ECB, Christine Lagarde who took over in December, also stated that a year long review of monetary policy, including the price stability target, would be conducted by the ECB. On the political front, Austria, Spain and Italy have been in the throes of **forming coalition governments** with some unlikely combinations of parties i.e. this raises questions around their likely endurance. The most recent results of German state elections has put further pressure on the frail German CDU/SDP coalition government and on the current leadership of the CDU.

CHINA. Economic growth has been weakening over successive years, despite repeated rounds of central bank stimulus; medium term risks are increasing. Major progress still needs to be made to eliminate excess industrial capacity and the stock of unsold property, and to address the level of non-performing loans in the banking and shadow banking systems. In addition, there still needs to be a greater switch from investment in industrial capacity, property construction and infrastructure to consumer goods production.

JAPAN - has been struggling to stimulate consistent significant GDP growth and to get inflation up to its target of 2%, despite huge monetary and fiscal stimulus. It is also making little progress on fundamental reform of the economy.

WORLD GROWTH. Until recent years, world growth has been boosted by increasing **globalisation** i.e. countries specialising in producing goods and commodities in which they have an economic advantage and which they then trade with the rest of the world. This has boosted worldwide

productivity and growth, and, by lowering costs, has also depressed inflation. However, the rise of China as an economic superpower over the last thirty years, which now accounts for nearly 20% of total world GDP, has unbalanced the world economy. The Chinese government has targeted achieving major world positions in specific key sectors and products, especially high tech areas and production of rare earth minerals used in high tech products. It is achieving this by massive financial support, (i.e. subsidies), to state owned firms, government directions to other firms, technology theft, restrictions on market access by foreign firms and informal targets for the domestic market share of Chinese producers in the selected sectors. This is regarded as being unfair competition that is putting western firms at an unfair disadvantage or even putting some out of business. It is also regarded with suspicion on the political front as China is an authoritarian country that is not averse to using economic and military power for political advantage. The current trade war between the US and China therefore needs to be seen against that backdrop. It is, therefore, likely that we are heading into a period where there will be a **reversal of world globalisation and a decoupling of western countries** from dependence on China to supply products. This is likely to produce a backdrop in the coming years of weak global growth and so weak inflation. **Central banks are, therefore, likely to come under more pressure to support growth by looser monetary policy measures and this will militate against central banks increasing interest rates.**

The trade war between the US and China is a major concern to **financial markets** due to the synchronised general weakening of growth in the major economies of the world, compounded by fears that there could even be a recession looming up in the US, though this is probably overblown. These concerns resulted in **government bond yields** in the developed world falling significantly during 2019. If there were a major worldwide downturn in growth, central banks in most of the major economies will have limited ammunition available, in terms of monetary policy measures, when rates are already very low in most countries, (apart from the US). There are also concerns about how much distortion of financial markets has already occurred with the current levels of quantitative easing purchases of debt by central banks and the use of negative central bank rates in some countries.

INTEREST RATE FORECASTS

The interest rate forecasts provided by Link Asset Services in paragraph 3.3 are **predicated on an assumption of an agreement being reached on Brexit between the UK and the EU**. On this basis, while GDP growth is likely to be subdued in 2019 and 2020 due to all the uncertainties around Brexit depressing consumer and business confidence, an agreement on the detailed terms of a trade deal is likely to lead to a boost to the rate of growth in subsequent years. This could, in turn, increase inflationary pressures in the economy and so cause the Bank of England to resume a series of gentle increases in Bank Rate. Just how fast, and how far, those increases will occur and rise to, will be data dependent. The forecasts in this report assume a modest recovery in the rate and timing of stronger growth and in the corresponding response by the Bank in raising rates.

- In the event of an **orderly non-agreement exit in December 2020**, it is likely that the Bank of England would take action to cut Bank Rate from 0.75% in order to help economic growth deal with the adverse effects of this situation. This is also likely to cause short to medium term gilt yields to fall.
- If there were a **disorderly Brexit**, then any cut in Bank Rate would be likely to last for a longer period and also depress short and medium gilt yields correspondingly. Quantitative easing could also be restarted by the Bank of England. It is also possible that the government could act to protect economic growth by implementing fiscal stimulus.

The balance of risks to the UK

- The overall balance of risks to economic growth in the UK is probably relatively even due to the weight of all the uncertainties over post-Brexit trade arrangements and the impact of an expansionary government spending policy (as expected in the Budget on 11th March).
- The balance of risks to increases or decreases in Bank Rate and shorter term PwLB rates are also broadly even.

One risk that is both an upside and downside risk, is that all central banks are now working in very different economic conditions than before the 2008 financial crash as there has been a major increase in consumer and other debt due to the exceptionally low levels of borrowing rates that have prevailed since 2008. This means that the neutral rate of interest in an economy, (i.e. the rate that is neither expansionary nor deflationary), is difficult to determine definitively in this new environment, although

central banks have made statements that they expect it to be much lower than before 2008. Central banks could therefore either over or under do increases in central interest rates.

Downside risks to current forecasts for UK gilt yields and PwLB rates currently include:

- **Post Brexit trade negotiations** – if it were to cause significant economic disruption and a major downturn in the rate of growth.
- **Bank of England** takes action too quickly, or too far, over the next three years to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.
- A resurgence of the **Eurozone sovereign debt crisis**. In 2018, Italy was a major concern due to having a populist coalition government which made a lot of anti-austerity and anti-EU noise. However, in September 2019 there was a major change in the coalition governing Italy which has brought to power a much more EU friendly government; this has eased the pressure on Italian bonds. Only time will tell whether this new coalition based on an unlikely alliance of two very different parties will endure.
- Weak capitalisation of some **European banks**, particularly Italian banks.
- **German minority government**. In the German general election of September 2017, Angela Merkel's CDU party was left in a vulnerable minority position dependent on the fractious support of the SPD party, as a result of the rise in popularity of the anti-immigration AfD party. The CDU has done badly in recent state elections but the SPD has done particularly badly and this has raised a major question mark over continuing to support the CDU. Angela Merkel has stepped down from being the CDU party leader but she intends to remain as Chancellor until 2021.
- **Other minority EU governments**. Austria, Finland, Sweden, Spain, Portugal, Netherlands and Belgium also have vulnerable minority governments dependent on coalitions which could prove fragile.
- **Austria, the Czech Republic, Poland and Hungary** now form a strongly anti-immigration bloc within the EU. There has also been rising anti-immigration sentiment in Germany and France.
- In October 2019, the IMF issued a report on the World Economic Outlook which flagged up a synchronised slowdown in world growth. However, it also flagged up that there was **potential for a rerun of the 2008 financial crisis**, but this time centred on the huge debt binge accumulated by corporations during the decade of low interest rates. This now means that there are corporates who would be unable to cover basic interest costs on **some \$19trn of corporate debt in major western economies**, if world growth was to dip further than just a minor cooling. This debt is mainly held by the shadow banking sector i.e. pension funds, insurers, hedge funds, asset managers etc., who, when there is \$15trn of corporate and government debt now yielding negative interest rates, have been searching for higher returns in riskier assets. Much of this debt is only marginally above investment grade so any rating downgrade could force some holders into a fire sale, which would then depress prices further and so set off a spiral down. The IMF's answer is to suggest imposing higher capital charges on lending to corporates and for central banks to regulate the investment operations of the shadow banking sector. In October 2019, the deputy Governor of the Bank of England also flagged up the dangers of banks and the shadow banking sector lending to corporates, especially highly leveraged corporates, which had risen back up to near pre-2008 levels.
- **Geopolitical risks**, for example in North Korea, but also in Europe and the Middle East, which could lead to increasing safe haven flows.

Upside risks to current forecasts for UK gilt yields and PWLB rates

- **Brexit** – if a comprehensive agreement on a trade deal was reached that removed all threats of economic and political disruption between the EU and the UK.
- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflationary pressures to build up too strongly within the UK economy, which then necessitates a later rapid series of increases in Bank Rate faster than we currently expect.
- **UK inflation**, whether domestically generated or imported, returning to sustained significantly higher levels causing an increase in the inflation premium inherent to gilt yields.

MSDC PAY POLICY STATEMENT 2020/21

REPORT OF: Simon Hughes, Head of Digital and Customer Services
Contact Officer: Tim Martland, HR Manager
Email: tim.martland@midsussex.gov.uk Tel: 01444 477251
Wards Affected: None
Key Decision: No
Report to: Council
22 July 2020

Purpose of Report

1. The purpose of this report is to ensure Members are aware of the statutory Pay Policy Statement for this Authority as required by Section 38 of the Localism Act 2011. Members should note that the Statement for Mid Sussex simply reflects our current practice. It does not introduce anything new. The statement has been updated following its initial introduction in March 2012, when Council agreed the document.

Recommendations

2. **Council Members are recommended to agree the Pay Policy at Appendix A, to comply with the requirements of the Localism Act.**
-

Background

3. The Localism Act 2011 received Royal Assent on 15th November 2011. Section 38 of the Act placed a new requirement on local authorities to publish a Pay Policy Statement by 31st March each year. The Statement must set out the Council's policies relating to:
 - Remuneration of its senior officers
 - Remuneration of its lowest-paid employees and
 - The relationship between the remuneration of its senior officers and the remuneration of its employees who are not senior officers.

Senior officers have been defined as the posts of Chief Executive, Assistant Chief Executive and the three Heads of Service.

This Statement has been put together taking into account the relevant sections within Chapter 8 'Pay Accountability' of the Localism Act 2011. In its development, consideration has also been given to the guidance produced by the Department for Communities and Local Government (DCLG) entitled 'Openness and Accountability in local pay – guidance under section 40 of the Localism Act'. Additionally, consideration has been given to the Code of Recommended Practice for Local Authorities on Data Transparency published by the DCLG in September 2011.

Several recommendations for promoting pay fairness in the public sector by tackling disparities between the lowest and the highest paid in public sector organisations were made in Will Hutton's report on fair pay in the public sector. This was published in March 2011. Hutton was asked to consider whether a public sector pay multiple, in which no manager could earn more than 20 times the lowest paid person in the organisation would be helpful as the core of a fair pay system in the public sector and to tackle pay disparities.

The aims behind Hutton's recommendations are not really aimed at authorities like Mid Sussex as we already publish the relevant information and our pay ratios are significantly below that threshold stated above. This is still achieved with the introduction of a new Apprenticeship grade.

It is a statutory requirement to publish a Statement and as such, the Council is complying with its obligations.

Policy Context

4. The proposed Pay Policy Statement 2020-21 is attached as Appendix A to this report. The Statement sets out the Council's policies in relation to the pay of its workforce, particularly its senior officers, and sits alongside the policies on pay that the Council has already adopted and published in its Pay Policy.

Financial Implications

5. There are no direct financial implications arising from this report as the Pay Policy Statement sets out the Council's policies relating to remuneration. It does not serve to set or agree specific rates or numerical amounts.

Risk Management Implications

6. The risks of not having a clear policy include being unable to recruit and retain staff, and being unable to demonstrate value for money to the taxpayer.

Equality and Customer Service Implications

7. An equality impact assessment has not been carried out, as it is not expected that any of the protected groups are affected by this report.

Other Material Implications

8. There is a statutory requirement to comply with the Localism Act and agree a Pay Policy by 31st March 2020. There are no environmental, human rights or community safety implications

Background Papers

9. There are no background papers.



MID SUSSEX DISTRICT COUNCIL
Pay Policy Statement
Financial year 2020-21

1. Purpose

The Council has an obligation under Section 38 (1) of the Localism Act 2011 to prepare a Pay Policy Statement for each financial year. It must be approved by Full Council and published on the Council's website.

This Pay Policy Statement covers the financial year 2020/21 and will need to be updated annually from April each year.

This Statement complements the Council's existing Pay Policy, which was approved by Council in November 2011 and came into operation on 1st January 2012.

The Statement sets out Mid Sussex District Council's policies relating to the pay of its workforce for the financial year 2020-21, in particular: -

- a) the remuneration of its Chief Officers
- b) the remuneration of its "lowest paid employees"
- c) the relationship between
 - the remuneration of its Chief Officers and
 - the remuneration of its employees who are not Chief Officers

2. Definitions

This Statement is required to use the following definitions: -

2.1 "Pay" in addition to salary includes charges, fees, allowances, benefits in kind, increases in/enhancements to pension entitlements, and termination payments.

2.2 "Chief Officer" refers to the following roles within the Council: -

- Members of the Council's Management Team, as follows:
 - Chief Executive
 - Assistant Chief Executive
 - Head of Corporate Resources
 - Head of Regulatory Services
 - Head of Digital and Customer Services

2.3 "Lowest paid employees" refers to those staff employed as Apprentices as it is the lowest grade on the Council's pay framework.

2.4 "Employee who is not a Chief Officer" refers to all staff who are not covered under the "Chief Officer" group above.

3. Pay framework and remuneration levels

3.1 General approach

Remuneration at all levels needs to be adequate to secure and retain high-quality employees to fulfill the council's business objectives and delivering services to the public.

This has to be balanced by ensuring remuneration is not, nor is seen to be, unnecessarily excessive.

Mid Sussex District Council supports the principle of equal opportunities in employment and believes that staff of different age, disability, gender (including staff who have proposed, commenced or completed gender re-assignment), race, religion or belief, or sexual orientation, with or without trade union membership, should receive equal pay for the same or broadly similar work, for work rated as equivalent and for work of equal value. With effect from 30th March 2018, the Council is required to publish figures relating to its gender pay gap.

Mid Sussex District Council will not make payments to staff, or those that could be considered to be staff, via Limited Companies. All staff will be directly employed by the Authority.

3.2 Responsibility for decisions on remuneration

It is essential for good governance that decisions on pay and reward packages for chief executives and chief officers are made in an open and accountable way and that there is a verified and accountable process for recommending the levels of top salaries.

Mid Sussex District Council will apply the pay agreements reached by the National Joint Council (*for staff not covered under the Chief Officers Group*) and Joint Negotiating Committee (*for Chief Officers*) on Pay and Conditions of Service. The Council may however choose to apply local variations as appropriate/locally devised conditions of service.

Any decision regarding the recruitment, selection and remuneration for the post of the Chief Executive and Head of Paid Service will be made by the whole Council and cannot be delegated. Advice on such matters will be given by a properly constituted 'Leader's Panel, set up by Council to deal with these matters as and when they arise. The Panel will be politically balanced and will take advice from the S151 Officer, the Monitoring Officer and the Head of Digital and Customer Services as a minimum, before recommendations are made to Council. Once an appointment has been made, future remuneration will be determined by the Leader of the Council. These awards will be based on a pay scale that has been agreed by Council.

3.3 Salary grades and grading framework

Grades are determined in line with national guidance, with the grade for each role being determined by a consistent job evaluation process. This followed a national requirement for all Local Authorities and other public sector employers to review their pay and grading frameworks to ensure fair and consistent practice for different groups of workers with the same employer.

There are 15 grades (Apprentice to MPO8) in the Council's pay framework for employees who are not Chief Officers, Apprentice grade being the lowest and grade MPO8 the highest. Each employee will be on one of the 15 grades based on the job evaluation of their role.

Each post within the officer establishment under Chief Officer Level is subject to grading by job evaluation, using the National Joint Council Green Book Scheme. The starting salary on appointment will normally be at the lowest point of the salary scale for the grade evaluated for the job, subject to negotiation based on the appointee's level of relevant experience. Progression beyond the starting salary will be dependent upon service and recommendation from the Head of Service, and will normally take effect from 1st April each year.

Subject to satisfactory service and a positive report from the employee's head of service, an employee's salary will rise by an annual increment payable on the 1st April each year until the maximum of the grade is reached. There will be no further progression payment once an employee reaches the maximum spinal column point of their salary grade scale. Remuneration is considered annually for staff, as per agreements reached as part of national negotiations with the National Joint Council on Pay and Conditions of Service.

For Chief Officers above grade MPO8 the value of any pay award is determined by the Joint Negotiating Committee for Chief Officers of Local Authorities.

The last pay award to both Chief Officers and employees who are not Chief Officers was made in April 2018 and effective until 31st March 2020.

4. Remuneration – level and element

4.1 Salaries

4.1.1 "Chief Officers" are those officers occupying the posts as identified in 2.2.

This group of "Chief Officers" is paid outside the Council's pay framework, which applies to all other employees.

The annual pay review for these Chief Officers is considered by the Joint Negotiating Committee for Chief Officers of Local Authorities each year.

Typically, these Chief Officers have received the same percentage award determined nationally for other grades of Local Government employees within the Council.

Salary on appointment for Chief Officers has regard to the demands and challenge of the role compared to other Chief Officer roles within the Council and the structure of the senior team. Account is also taken of other relevant available information, including the salaries of Chief Officers in other similar sized organisations. The final decision on the salary on appointment for chief officers lies with the Chief Executive or the Head of Digital and Customer Services.

The Council's Senior Officer remuneration data is already published within the annual Statement of Accounts and can be found on the Council's website at

<https://www.midsussex.gov.uk/media/4160/statement-of-accounts-2018-19.pdf>

4.2 Bonuses

The Council has no provision for, and does not intend to make bonus payments for any group of staff. It is not the Council's policy to pay substantive honoraria, unless in exceptional circumstances and agreed by the Head of Paid Service.

4.3 Acting Up Payments

As per section 12 of the Council's Pay Policy, all contracted employees may be required to take on an acting up role, for which the sum payable will be commensurate with the substantive post being covered if the staff member acting up is being asked to be responsible for all the duties of the post. If the individual is only carrying out some of the duties of the higher-grade job, the calculation will be adjusted accordingly in relation to the specific duties being carried out.

The acting up duties should be carried out for a continuous period of at least 4 weeks (other than cover for annual leave) and should be time-limited to cover a specific short-term requirement which should not exceed 12 months in duration.

4.4 Market Supplements

It is recognised that a shortage of staff with particular skills – either locally or nationally – may drive up the 'going rate' and create difficulties in recruiting and retaining staff. Mid Sussex District Council has recognised the potential for such problems and may consider paying market supplements or enhancements to an individual or group of employees where this can be objectively justified. The specific measures for managing and monitoring this process is detailed in section 10 of the Council's Pay Policy.

4.5 Other pay elements

All staff are subject to the same performance management process.

Targets are set and performance against those targets is assessed. Subject to satisfactory performance, all staff will receive incremental progression until the top of their grade is reached.

4.6 Charges, fees or allowances

Any allowance or other payments will only be made to staff in connection with their role or the patterns of hours they work and must be in accordance with the Council's policies and collective agreements.

4.6.1 Electoral payments to officers

The Head of Regulatory Services is the Council's Returning Officer. The fees for this role are paid according to a national fees & charges order in the case of national elections, or the scale of fees & charges agreed in West Sussex in the case of local elections. From this fee, the Returning Officer will pay discretionary fees to any Deputy Returning Officers appointed for that election.

The Returning Officer will also charge a clerical fee to the body for which the election is being held. This fee is devised from a formula laid out in the scale of fees & charges agreed in West Sussex. This amount is then distributed across the elections core team according to the degree of responsibility undertaken and the amount of additional work required. In general, the elections core team is made up of Council officers, including some senior officers, though this is not a requirement as the work is being undertaken for the Returning Officer.

Council Officers employed by the Returning Officer in specific electoral roles, such as Presiding Officer, Poll Clerk, Polling Station Inspector, Count Supervisor, Count Assistant, Postal Vote Opening Supervisor and Postal Vote Opening Assistant will receive a fee according to the scale of fees & charges agreed in West Sussex. Non-Council employees working in the same roles receive precisely the same remuneration.

It is to be noted that the above payments do not form part of any employee's contractual entitlement or payments. Further details regarding these allowances can be made available on request.

4.6.2 Car Allowance and Mileage

Prior to February 2010, the Council adopted an enhanced car allowance scheme for eligible employees. However, this enhanced element has now been phased out.

Where a post attracts essential car user status, the postholder will receive a lump sum allowance per annum and mileage rate in accordance with HMC Car Allowance Rates. These allowances apply to all employees.

4.7 Benefits in kind

4.7.1 Mid Sussex Council Membership

The Emerald Scheme is a discounted membership scheme for employees of the Council to use the leisure facilities at its three leisure centres located within the district. This benefit is open to all contracted employees.

4.7.2 Health and Life Insurance Cover

All Chief Officers are eligible for health and life insurance cover, the data of which is contained within the Statement of Accounts as referenced to in Section 4.1.1.

4.8 Pay and Performance

There is no separate provision or intention for performance related pay for any Council employee.

4.9 Pension

All employees as a result of their employment are eligible to join the Local Government Pension Scheme.

4.10 Severance Payments

We are already required to publish our policy on discretionary payments on early termination of employment as well as publishing our policy on increasing an employee's total pension scheme membership and on awarding additional pension where applicable.

Please refer to the Local Government (Early Termination of Employment) (Discretionary Compensation) Regulations 2006 as revised in 2010 for details regarding compensation for loss of employment as a result of both voluntary and compulsory redundancy.

Given that the formula for statutory redundancy payments based on age and service is deemed by the Government to be permitted under the EU Directive on Age, as per regulation 33 of the Age Discrimination Regulations, the Council will link compensation payments to the statutory redundancy pay calculator.

In cases of voluntary redundancy, the Council will use a multiplier of 2.1 (i.e. multiplying the number of weeks' pay the employee would be entitled to under the statutory formula to the factor of 2.1), giving a maximum payment of 63 weeks' pay, including the statutory redundancy payment.

In cases of compulsory redundancy, the Council will use a multiplier of 2 (i.e. multiplying the number of weeks' pay the employee would be entitled to under the statutory formula to the factor of 2), giving a maximum payment of 60 weeks' pay, including the statutory redundancy payment.

Employees who are members of the Local Government Pension Scheme to be given the option of converting compensation payments (less the statutory redundancy payment) into additional pensionable service on a strictly cost-neutral basis, in accordance with the formula published by the Government.

The Council will not make use of the augmentation provisions of regulation 52 of the LGPS.

Any other discretionary payments on early termination of employment will be agreed on a case by case basis by the relevant Chief Officer, in conjunction with the Head of Digital and Customer Services.

The Council would not consider it appropriate to re-employ a Chief Officer who had previously received a redundancy or severance package on leaving Mid Sussex District Council within the previous five years. Nor would it be considered appropriate for that individual to return on a 'contract for services'.

4.11 New starters joining the Council

Employees new to the Council will normally be appointed to the first point of the salary range for their grade. Where the candidate's current employment package would make the first point of the salary range unattractive (and this can be demonstrated by the applicant in relation to current earnings) or where the employee already operates at a level commensurate with a higher salary, a higher salary may be considered by the recruiting manager. This will be within the salary range for the grade. The candidate's level of skill and experience should be consistent with that of other employees in a similar position on the salary range.

5. Relationship between remuneration of "Chief Officers" and "employees who are not Chief Officers"

The ratio between the average Chief Officer earnings and the mean average earnings across the Council is 100:33.

The ratio between the average Chief Officer earnings and the lowest grade currently used is 100:18.

This calculation is based on all taxable earnings for the year, including base salary, allowances and the cash value of any benefits in kind where appropriate.

EQUALITY AND DIVERSITY SCHEME 2020-24

REPORT OF: TOM CLARK, HEAD OF REGULATORY SERVICES
Contact Officer: Neal Barton, Policy, Performance and Partnerships Manager
Email: Neal.Barton@midsussex.gov.uk Tel: 01444 477588
Wards Affected: All
Key Decision: No
Report to: Council
Date of meeting: 22nd July 2020

Purpose of report

1. The purpose of this report is to present a proposed Equality and Diversity Scheme 2020-24. It also proposes that in approving the Scheme, the Council adopts the International Holocaust Remembrance Alliance's (IHRA) working definition of antisemitism and guidelines.

Recommendations

2. **Council is requested to:**
 - 2.1 **approve the proposed Equality and Diversity Scheme 2020-24 attached at Appendix 1**
 - 2.2 **adopt the IHRA definition of antisemitism and guidelines attached at Appendix 2.**
-

Background

3. This report presents a proposed Mid Sussex District Council Equality and Diversity Scheme 2020-24. The Scheme was considered by the Scrutiny Committee for Community, Customer Services and Service Delivery at their meeting on 5th February 2020 and has been subject to consultation.
4. The Council's current Equality and Diversity Scheme 2016 – 20 was adopted in March 2016. This was a reflection of the Equality Act 2010, which brought together a number of pieces of legislation such as the Sex Discrimination Act, Race Relations Act and Disability Discrimination Act. The Act also brought in a number of new responsibilities for councils, including a public sector equality duty and a requirement to promote equality of opportunity between those with "protected characteristics" and others. The Act is now 10 years old and bedded into public life.
5. The public sector equality duty means that the Council must in the exercise of its functions have due regard to:
 - eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - advancing equality of opportunity between people who share a protected characteristic and those who do not
 - fostering good relations between people who share a protected characteristic and those who do not.

The nine protected characteristics are:

- age
 - sex
 - race
 - disability
 - religion or belief
 - pregnancy and maternity
 - sexual orientation
 - marriage and civil partnership
 - gender reassignment
6. In addition to the protected characteristics, the Council's equality and diversity activities address issues arising from residential location and income or skill level. It also covers supporting the needs of the armed forces community.

Equality and Diversity Scheme 2020-24

7. The Council's proposed new Equality and Diversity Scheme is included at Appendix 1 and sets out:
- The legislative background, including the implications of the Equality Act 2010.
 - The Council's Equality Objectives and examples of some of the action that we intend to take to support their achievement.
 - An assessment of the issues faced by each of the protected groups in Mid Sussex and examples of the measures that the Council is taking to meet their needs. Similar information is provided in respect of residential location; income or skill level; and the Armed Forces community.
 - A section focusing on the Council's Equality and Diversity responsibilities as an employer.
 - A section setting out responsibility for implementation of the scheme at Member and Chief Officer level and monitoring arrangements.
8. The Equality Act requires the Council to demonstrate on an annual basis how it is meeting the Public Sector Equality Duty. This is achieved through an annual progress report with information on the specific service improvements that have been delivered in the year. The 2019 Progress Report was considered by the Scrutiny Committee for Community, Customer Services and Service Delivery on 5th February 2020 and has been published on the Council's website <https://www.midsussex.gov.uk/about-us/equality-and-diversity/> The Scheme proposes that the Scrutiny Committee should continue to have responsibility for considering an annual progress report.

Equality Objectives

9. The Equality Act introduced specific duties for public bodies to publish Equality Objectives and equality data to show their compliance with the duty and for these to be reviewed at least every four years. The Council's Equality Objectives were originally adopted in March 2012 and revised in 2016. These four objectives have been retained in the new scheme, but now make reference to support for the armed forces community. The Council's proposed Equality Objectives read as follows:
1. We will show leadership and commitment in promoting equality and diversity.
 2. We will consider the needs of individuals across the whole community, and especially those groups protected by the Equality Act 2010, when we plan and deliver our services.

3. We will seek to prevent discrimination and to promote good relations between different sectors of our community.
4. As an employer, we will seek to promote equality and respect for diversity in the workplace by providing appropriate staff policies, training and support, including assistance for former members of the armed forces.

IHRA Definition of Antisemitism

10. The Government has requested that all councils formally adopt the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism and to use it on all appropriate occasions. This has already been adopted by over 200 councils and reads as follows:

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

11. The proposed new Equality and Diversity Scheme under Religion or Belief refers to the Council adopting the IHRA definition and its adoption by the Council was recommended at the Scrutiny Committee meeting on 5th February 2020. The Alliance has issued guidelines on the manifestations of antisemitism, which are set out in appendix 2.

Consultation Arrangements

12. Following consideration of the scheme at Scrutiny Committee, consultation has taken place through the Council’s website and contact with the main equality related groups in Mid Sussex that the Council works with. These include Age UK, Mid Sussex Older People’s Council, Mid Sussex Voluntary Action, Citizens Advice, Social Landlords, foodbanks, Town and Parish Councils. Mid Sussex Voluntary Action publicised the consultation via their e-bulletin, which goes to a large number of groups in the District. There were no responses received contrary to the proposed scheme.

Policy Context

13. The delivery of the Council’s Equality Objectives will make a major contribution to the Council’s priorities set out in the Corporate Plan, especially effective and responsive services and strong and resilient communities.
14. The COVID-19 pandemic has raised equality and diversity issues, which will be addressed in future reports and through the Council’s Equality Impact Assessments.

Other Options Considered

15. The report provides a new Equality and Diversity Scheme, which is designed to set out a programme to meet the Council’s statutory requirements under the Equality Act. No other practicable options were identified.

Financial Implications

16. There are no direct financial implications arising from this report.

Risk Management Implications

17. The Equality and Diversity Scheme and Progress Report helps the Council to demonstrate that it is meeting the public sector equalities duty under the Equality Act and to avoid the risks associated with non-compliance.

Equalities and customer service implications

18. The purpose of the scheme is to set out the Council's approach to delivering its duties under the Equality Act and ensuring access to its services.

Other material implications

19. None.

Background Papers

None



Mid Sussex District Council

Equality and Diversity Scheme

2020 – 2024

March 2020

Contents

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Foreword

This Equality and Diversity Scheme sets out the Council's commitment to meeting the public sector duty under the Equality Act to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. This applies to everything that the Council does, whether providing services to our local population, employing people, working with partners, developing policies or communicating and involving people in our decision making.

Mid Sussex is fortunate in being a generally prosperous area, whose residents in the main enjoy good health and above average life expectancy. However, anyone can be discriminated against and suffer disadvantage which affects their quality of life. This scheme identifies the issues faced by the protected groups in Mid Sussex and the measures that we are taking in response. We also recognise that living in a rural area or having poor skills or low income can impact on people's life chances, so our scheme addresses these issues too. The scheme also covers our work to support the needs of the Armed Forces Community.

We value the diversity of people within the District and will regularly monitor progress to the scheme. Particularly important is ensuring that we know our community, by local analysis and engagement. The latest information suggests that there have been increases in the numbers of over 65s and 85s in Mid Sussex, with the District becoming more diverse in terms of its ethnicity and religious beliefs. These factors present challenges and opportunities, which will be reflected in the way that we plan our services.

I would like to acknowledge the contribution of the partner organisations that we work with to promote equality and diversity in Mid Sussex. Our grants scheme supports a wide range of community organisations and projects that seek to assist vulnerable groups.

We are committed to being an employer of choice, providing a flexible and supportive working environment and trying to ensure that our workforce reflects the community that we serve. As Cabinet Member with responsibility for this area of work, I recognise that our elected members, who know and represent their communities, are central to both policy development and to the scrutiny of this work. We will work with staff to ensure that we deliver against our Equality Objectives.

Councillor Norman Webster Cabinet Member for Community

1. Introduction

The purpose of the Equality and Diversity Scheme is to:

- a) Show how the Council will meet the requirements of the Equality Act and the public sector equality duty. This is in relation to our work in representing, employing and serving people and as a partner working with other organisations.
- b) Set out the Council's Equality Objectives and to outline the main actions that the Council intends to take for their achievement.
- c) Enable monitoring of progress.
- d) Enable the public and other agencies to hold the Council to account for progress.

We produce an annual Equality and Diversity Progress Report, which is published on the Council's website.

Equality Act 2010

The Equality Act 2010 introduced a public sector equality duty and nine protected characteristics. The duty means that the Council must in the exercise of its duties have due regard to:

- eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advancing equality of opportunity between people who share a protected characteristic and those who do not.
- fostering good relations between people who share a protected characteristic and those who do not.

Having due regard for advancing equality involves:

- removing or minimising disadvantages suffered by people due to their protected characteristics.
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The nine protected characteristics covered by the duty are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation
- marriage and civil partnership (but only in respect of eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act).

2. The Council's Equality Objectives

It is a requirement under the Equality Act for the Council to have a set of Equality Objectives and to review them at least every four years. The Council's Equality Objectives were adopted in 2011 and were subject to a consultation exercise. They were amended in 2016, with the adoption of the Council's Equality and Diversity Scheme 2016 – 2020. These four objectives have been retained and now make reference to support for the armed forces community, which the Council has decided to integrate with its equality and diversity work. The objectives are shown below, together with some of the actions that have been identified for their delivery over the next four years.

Objective 1. We will show leadership and commitment in promoting equality and diversity

Supporting actions:

- Publish a reviewed Equality and Diversity Scheme every four years.
- Prepare an Equality and Diversity Annual Report by March each year, reviewing progress to the scheme and setting out further action for the year ahead.
- Provide equalities training for Members at least every electoral cycle.

Objective 2. We will consider the needs of individuals across the whole community, and especially those groups protected by the Equality Act 2010, when we plan and deliver our services.

Supporting actions:

- Ensure that our community engagement follows the best practice principles contained in the Statement of Community Involvement.
- Use the Council's Grants Schemes to support organisations that promote the interests of protected groups in Mid Sussex.
- Ensure that equality and customer service implications are taken onto account in our decision making through the appropriate use of Equality Impact Assessments and references in Committee Reports.
- Ensure that the Council's website continues to maintain high standards of accessibility, with more customers benefitting from online transactions.
- Use a range of communication methods, including social media, to widen the range of people that we communicate with.
- Deliver further improvements to the accessibility of the Council's buildings and open spaces.
- Act in accordance with our Armed Forces Community Covenant.

Objective 3. We will seek to prevent discrimination and to promote good relations between different sectors of our community.

Supporting actions:

- Work through the Mid Sussex Partnership to tackle Hate Crime, Anti-Social Behaviour and domestic abuse.
- Ensure that the Council's communications continue to include positive content and images of a diverse Mid Sussex.
- Work to address the accommodation needs of Gypsies and Travellers.

- Celebrate those that contribute to their communities through schemes such as Mid Sussex Applauds.

Objective 4. As an employer, we will seek to promote equality and respect for diversity in the workplace by providing appropriate staff policies, training and support, including assistance for former members of the armed forces.

Supporting actions:

- Monitor and publish annually data about the Council's staff through a Workforce Monitoring Report looking at the composition of our staff in relation to the background Mid Sussex population and to ensure that there are no sex or age related pay issues.
- Provide equalities and diversity training for all staff at least every 3 years.
- Include equalities and diversity in the induction programme for new staff.
- Supporting former members of the armed forces through the Community Covenant and Employer Recognition Scheme.

3. Meeting the needs of Protected Groups in Mid Sussex

This section of the scheme looks at references to the protected groups in the Equality Act, the issues that they face in Mid Sussex and how the Council is responding in its service delivery. As well as protected groups our Equality and Diversity Scheme also covers potential disadvantage arising from residential location (for example rural isolation) and levels of income or skills. The Council has decided to include addressing the needs of the Armed Forces community in its Equality and Diversity Scheme. Demographic and needs information about the District comes from a number of sources including the Mid Sussex Strategic Intelligence Assessment which is prepared annually to inform the priorities of the Mid Sussex Partnership.

Disability

The Equality Act states that a person has a disability if:

- they have a physical or mental impairment
- the impairment has a substantial and long-term adverse effect on their ability to perform day to day activities.

The Act also provides rights for people not to be directly discriminated against or harassed because they have an association with a disabled person. This can apply to a carer or parent of a disabled person.

The 2011 census showed that 14.2% of Mid Sussex households contained at least one person with a long term illness, health problem or disability which limits their daily activities, compared with 13.5% in 2001. Health Study information and predictions to 2030 suggest that, while the number of people with a disability aged 18-64 is expected to rise only moderately, the rate of increase for those aged 65+ is much higher, reflecting the projected increase in this sector of the population. A further consequence of our ageing population is that whilst in 2014 there were 14,201 people living with dementia in West Sussex, this is predicted to rise to more than 16,692 by the year 2021.

Particular difficulties that the Council can assist people with a disability to overcome include issues of access and the need to promote independent living. Also ensuring that the needs of those with different types of disability are met, such as people with learning difficulties, mental health issues, physical disability, hearing or visual impairment.

There has been a significant increase in the number of vulnerable people with mental health issues approaching the Council for help. For example, 35% of the homeless acceptances in 2018/19 were from households who are vulnerable due to mental health issues. Also, 60% of the single person households in temporary accommodation had mental health issues.

Measures that we are taking:

Examples include:

- Promotion of independent living - provision of Disabled Facilities Grants to enable disabled people and parents with disabled children to adapt their homes to meet their needs.
- Tailored customer services - assisted refuse collections, home visits.
- Improving the accessibility of Council buildings, facilities and parks - disabled car parking spaces, accessible toilets, Changing Places public conveniences, providing suitable access paths in green spaces and play equipment for children with disabilities in our parks.
- Accessible new housing and public spaces- providing new wheelchair accessible affordable housing and extra care housing. Involvement of the East Grinstead Access Group in planning applications and the public realm in new housing developments. Working through town centre regeneration projects to improve the accessibility of our town centres.
- Leisure and community activities - programmes of activity for disabled people at our leisure centres and using our grants scheme to support voluntary organisations that provide services to disabled people.
- Ensuring that Council publications and the website are accessible, for example through Browsealoud.
- Participating in campaigns aimed at promoting the interests of people with disabilities, such as Dementia Friendly Communities and Pavements are for People.
- Updating our main reception signage and public toilet facility to ensure it meets the needs of those with additional needs including people living with dementia.
- Being a member of the Compass Card Scheme that helps disabled young people and their families to make the most of local leisure activities. Cardholders in Mid Sussex have access to half price tennis court booking, Petanque and bowls facilities.

Race

The Equality Act refers to discrimination on the grounds of race, which it defines as colour, nationality, ethnic or national origins.

The last Census results showed that 9.7% of the Mid Sussex population are from Black and Minority Ethnic (BME) Groups. "White Other" groups make up 4.8% of the District's population, comprising 0.9% White Irish, 0.1% who identify themselves as Gypsy or Irish Traveller and 3.8% "Other White". The biggest other single group is Asian or Asian British: Indian at 1%. The Census data also provides information on country of birth. This shows that 90.3% of Mid Sussex residents were born in the UK, 0.7% in Ireland, 2.9% from other European Union countries and 6.1% from other countries.

Measures that we are taking:

Examples include:

- Customer service – provision of translation and interpretation. Our web site allows translation of any document on the site.

- Community safety – systems for reporting and dealing with racially motivated hate crime and anti-social behaviour.
- Planning to meet the accommodation needs of Gypsies and Travellers – working to assess their accommodation needs and to adopt an Allocations Development Plan identifying potential sites for additional pitches.
- Providing Gypsy and Traveller accommodation through management of the site at Bedelands, Burgess Hill.

Age

Age is a fundamental factor affecting people's life experiences. Mid Sussex has an older age structure with 20% of residents over 65 compared to 18% in England as a whole. The number of people aged 65+ and 85+ is projected to rise in the next 10 years by 22% and 28% respectively. An increasing number of people have one or more long-term health conditions and there are over 14,000 carers in the District. These projections for an ageing population, means an increasing demand for services to meet the needs of these groups. A large number of older people live alone (over 7,500 65+ in 2011) and due to the predominantly rural nature of the District, there is an increasing danger that many older people will face social isolation and feel cut off from the wider community.

Feelings of being socially excluded and marginalised within these communities also need to be considered in relation to younger people. This means that we need innovative measures to engage with young people to empower them to participate in their local communities. Also, providing youth activities in order to meet the perceived need for young people to have "something to do".

Measures that we are taking:

Examples for older people include:

- Engagement with and funding for groups such as the Mid Sussex Older People's Council
- Production of the Community Connections Directory to publicise the clubs and activities that they can participate in to maintain their health and wellbeing and the services available to meet their needs.
- Providing activities for older people, such as Healthy Walks, Health and Wellbeing initiatives in support of ageing well and promoting independent living. Including older people in our updated safeguarding policies.
- Supporting Silver Sunday with a small grants scheme for community organisations to hold events.

Examples for young people include:

- Engagement with local young people by providing community youth activities, especially in the holiday period in their neighbourhood in Mid Sussex District Council recreation grounds and Skate Parks.
- Leading Better Young Lives a forum of professionals from the statutory and voluntary sector to ensure better lives and outcomes for children and young people.
- Improving and developing the equipment of Mid Sussex District Council amenities such as skate parks and play areas consulting with local users.
- Facilities provided at leisure centres, together with programmes to encourage youth sport.

Sexuality

The Equality Act refers to a person's sexual orientation as their sexual attraction to persons of the same, opposite or either sex.

The Office for National Statistics carries out a survey of a sample of households which includes a question on sexual orientation. Data for the South East from the survey undertaken in 2012, estimated that 0.9% of people identified themselves as gay or lesbian, 0.4% as bisexual and 0.4% as "other".

Measures that we are taking:

Examples include:

- Homophobic crime is one of the categories of hate crime that is monitored and reported upon.
- Providing equal opportunity in employment - our staff monitoring survey includes a question on sexuality.

Sex

Information from the Office for National Statistics 2015 suggests that the overall split in the District is 48.8% male and 51.2% female. Estimates from the ONS for life expectancy in Mid Sussex are 80.8 years for men and 83.0 years for women.

Issues related to this protected characteristic include ensuring equal access to our services and addressing issues such as domestic abuse. Also, ensuring that our employment practices are fair and address equality issues.

Measures that we are taking:

Examples include:

- Community safety - providing support for services for women and men suffering domestic abuse.
- Leisure and health promotion - targeted schemes for getting young women active and for men's health.
- Employment practice - equal pay and flexible working policies.

Gender reassignment

The Equality Act states that a transsexual person has the protected characteristic of gender reassignment if they are proposing to undergo, are undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex.

It is difficult to establish the numbers in this protected group. There were no questions in the 2011 Census regarding gender identity. The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender.

Measures that we are taking:

Examples include:

- Community safety - hate crime incident reporting includes the recording of hate crime motivated by transphobia, which refers to various kinds of aversion towards transsexual people.
- Using the Better Young Lives Forum to provide information about the support available for young people with gender identity issues.

Religion or Belief

The protected characteristic of religion or belief includes any religion and any religious or philosophical belief. It also includes a lack of any such religion or belief. Information from the 2011 census shows that 62.7% of Mid Sussex residents stated their religion as Christian, with the second largest group being those with no religion at 26.6%. Of the remaining 2.8% who stated their religion, responses were spread across a number of faiths, with Muslim being the largest at 0.8%.

It is important that the Council respects the sensitivities of faith issues in its decision-making, employment policies and provision of services.

Measures that we are taking:

Examples include:

- Tackling religiously motivated hate crime.
- Using our links with faith-based groups in our community development work, e.g. Churches Together and the Foodbanks in Mid Sussex, linking to Money Advice Services provided by the Kings Church in Burgess Hill and the debt centre at Trinity Methodist Church in East Grinstead, supporting the Jubilee Hub (part of Kings Church) in East Grinstead.
- The Council is adopting the working definition of antisemitism produced by the International Holocaust Remembrance Alliance from the Stockholm Declaration <https://www.holocaustremembrance.com/working-definition-antisemitism?focus=antisemitismandholocaustdenial>

Pregnancy and Maternity

The Equality Act prohibits discrimination on the grounds of pregnancy or maternity. This relates to a defined protected period from conception to the end of statutory maternity leave.

Issues around pregnancy and maternity are mainly relevant to the Council in its role as an employer, but also in the accessibility of our facilities for pregnant women and parents with young children.

Measures that we are taking:

Examples include:

- Employment practices - maternity/paternity arrangements.
- Access issues - unisex access to baby changing facilities in our public toilets. Parent and toddler spaces in our car parks. Access to buildings for parents with young children.

Marriage and Civil Partnership

Under the Equality Act 2010, it is unlawful to directly or indirectly discriminate against or harass a person because they are married or in a civil partnership. Marriage and civil partnership is only a protected characteristic in the context of the Council's employment

practices, for example in ensuring that employees who have a civil partnership are treated in the same way as married employees. Same sex weddings became legal in England and Wales from March 2014.

The next two categories of disadvantage are not covered by the protected groups referred to in the Equality Act, but are important factors in the delivery of the Council's aim to ensure that all sectors of the community can thrive and enjoy access to our services. They are income or skills level and residential location.

Income or skill level

Mid Sussex is one of the least deprived districts in the country. However, the levels of deprivation vary considerably across the District and there are pockets of deprivation within Haywards Heath, Burgess Hill and East Grinstead. Information from the 2011 census shows that the population is generally well qualified, with 33.6% qualified to level 4 or 5 (first degree or higher), the highest in West Sussex. Conversely, 14.8% have no qualifications, the lowest in the County.

Welfare reforms are impacting on people, whether working or not, who are in receipt of benefit. This has particular implications for the Council's Housing Needs and Benefits services and requires initiatives to ensure that those affected by the welfare changes are supported. The Council has an important role to play in helping people into work through supporting them to improve their skills and removing obstacles to finding employment.

Measures that we are taking:

Examples include:

- Benefits Services - operation of the Discretionary Housing Payments scheme and working with the Department of Works and Pensions and other partners on the introduction of Universal Credit.
- Housing Services - providing housing advice and temporary accommodation for homeless people; supporting people to access the private sector through our Rent in Advance and Deposit Guarantee Scheme that helps those with insufficient funds for a deposit; provision of affordable housing.
- Working with Housing Associations to target support at social housing tenants affected by the welfare reforms.
- Debt advice - providing access to debt advice services and supporting the local Credit Union.
- Measures to address fuel poverty and affordable warmth.
- Community projects in areas of relative deprivation.
- Employment projects - working to get local people into work, especially geared towards young people Not in Education or Employment (NEETs).
- Providing community leadership in working for the reopening of the Sixth Form College at Haywards Heath.

Residential Location

The Council recognises that whether our residents live in a rural or urban location can affect how they access our services. Based on Office for National Statistics data for 2011, it is estimated that 22.7% of the population of Mid Sussex, some 31,800 people, live in the rural wards and therefore could be experiencing rural isolation. This is associated with issues such as travel difficulties for those dependent upon public transport, high local housing prices and a lack of community facilities.

Measures that we are taking:

Examples include:

- Customer service - offering on-line services and visiting officers.
- Providing rural affordable housing - including working with Parish Councils and developers on Rural Exception Sites.
- Investing in community facilities in rural areas such as pavilions and village halls.
- Funding Action in rural Sussex (AirS) to support rural communities.

Support for the Armed Forces Community

Mid Sussex District Council signed the Armed Forces Community Covenant in September 2014, which is a statement of mutual support between the District Council and the local Armed Forces community. Specifically, the Covenant aims to:

- Encourage local communities and the Armed Forces community to support each other:
- Nurture public understanding and promote awareness of issues affecting the Armed Forces community.
- Recognise and remember the sacrifices made by the Armed Forces community.
- Encourage activities which help to integrate the Armed Forces community into local life.

The Council also received the Bronze Employer Recognition Scheme award in January 2018, which shows support for the Armed Forces community through its employment policies. Initiatives associated with this have included the adoption of a guaranteed interview scheme for suitably qualified applicants with an armed forces connection and proper recognition in the Council's employment policies of provision for members of the Reserve Forces.

Measures that we are taking:

Examples include:

- The Council publicises the Heroes Welcome Scheme, which provides for retailers to provide discounts to service personnel.
- Participation in events such as Armed Forces Day and Remembrance Day.
- The Council's Housing Allocation Scheme exempts those with an armed forces connection from the usual requirements to have a local connection to the District to be on the Housing Register.

Council initiatives that benefit a range of protected groups

In looking at the measures that we are taking to meet the individual needs of the protected groups, there are a number of initiatives that the Council is delivering that cover a range of equality issues such as:

- The operation of our grants scheme to support a wide range of community organisations and projects that seek to assist vulnerable groups. The grants scheme funds through partnership agreements, a core of voluntary organisations that support vulnerable people of all ages and backgrounds, such as Citizens Advice; Age UK; Mid Sussex Voluntary Action; and Action in rural Sussex.
- Our systems for reporting and dealing with hate crime and anti-social behaviour, motivated by racial, faith, disability or homophobic prejudice.

- Provision of a balanced range of activities offered at our leisure centres to suit all sectors of the community. We also work with the health sector on the promotion of sport and healthy lifestyles.
- Working with Places Leisure and Alzheimer's Society to deliver Living Well events in the leisure centres offering free taster activities for people aged 50 plus with a focus on people living with dementia and their carers.
- Our Health and Wellbeing service provided on behalf of NHS West Sussex and the County Council. The services provided by the Wellbeing Hub are of particular benefit to vulnerable groups, for example in addressing issues associated with an ageing population, fuel poverty and support for carers.
- The Mid Sussex Applauds Awards recognises individuals and organisations for their contribution to their communities, with nominations open to the public in eight categories.

Equality Impact Assessments

The Council completes Equality Impact Assessments for its major changes to services and where there are relevant new policies. The assessments identify opportunities to promote equality and the barriers to services/differential impact on the protected groups in Mid Sussex. The completed assessments are published on the Council's website.

There is also a standard section in all of the Council's reports to Members, which assesses the "Equality and Customer Services Implications" of the actions referred to in the report.

Equality and Diversity and the Council's Procurement

The Council provides a wide range of services to the community in Mid Sussex, some of which are provided directly and others on our behalf by contractors and partners. We seek to ensure that the contractors that the Council uses and partners with whom we work have the same standards in meeting equality and diversity requirements. Equality considerations are assessed as part of every procurement exercise and embedded into the specification and contractual conditions.

Equality and Diversity and the Council's staff

The Council's equality and diversity responsibilities as an employer are met through our employment policies, which aim to ensure that all staff are treated fairly and with respect. These include Dignity at Work; Code of Conduct; Equal Opportunities; Family Friendly; Disciplinary and Grievance Policy. There is also the provision of regular Equality and Diversity staff training, both general awareness training and tailored courses for frontline staff on meeting the needs of customers with specific needs.

The Council monitors the composition of its staff in relation to the background Mid Sussex population so that we are aware of how representative the workforce is of the people that we are seeking to serve. We publish an Annual Workforce Monitoring Report as part of the requirement to publish equality data, which includes information about age, gender, ethnicity, disability and religion. The Report includes information about the gender pay gap, comparing the average male and female employee pay. We also publish a quarterly staff profile, which appears on the employment page of the website.

4. Responsibility for the Scheme and Monitoring Arrangements

Responsibility for the implementation of this scheme at Member level rests with the Cabinet Member for Community. The lead at Management Team level will be with the appropriate

Head of Service, currently the Head of Regulatory Services. The Council's Scrutiny Committee for Community, Customer Services and Service Delivery will be responsible for scrutinising the scheme, prior to its adoption by Full Council, and will consider an annual progress report.

International Holocaust Remembrance Alliance Definition of Antisemitism

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

The guidelines highlight manifestations of antisemitism as including:

- “Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- Applying double standards by requiring of it behaviour not expected or demanded of any other democratic nation.
- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.”

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.

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SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT – SUBMISSION DRAFT (REGULATION 19)

REPORT OF: Judy Holmes, Assistant Chief Executive
Contact Officer: Sally Blomfield – Divisional Leader for Planning and Economy
Wards Affected: All
Key Decision: Yes
Report to: Council
Date of meeting: 22nd July 2020

Purpose of Report

1. The purpose of this report is to ask Council to approve the submission draft Site Allocations Development Plan Document (the submission draft Sites DPD) and supporting documents for eight weeks public consultation commencing 3rd August 2020, followed by submission to the Secretary of State for examination.

Summary

2. The submission draft Sites DPD was considered at the meeting of the Scrutiny Committee for Housing, Planning and Economic Growth on 11th March 2020.

Recommendations

3. **That Council:**
 - (i) **Approves the submission draft Site Allocations DPD, and supporting documentation, for eight weeks public consultation starting on 3rd August 2020;**
 - (ii) **Agrees that, following conclusion of the public consultation, the submission draft Site Allocations DPD, and supporting documentation, is submitted to the Secretary of State for examination;**
 - (iii) **Authorises the Divisional Leader for Planning and Economy, in consultation with the Cabinet Member for Planning, to make any necessary minor typographical and factual changes to the submission draft Site Allocations DPD prior to submission; and**
 - (iv) **Authorises the Divisional Leader for Planning and Economy, in consultation with the Cabinet Member for Planning, to suggest any necessary modifications to the submission draft Site Allocations DPD during the examination process to help secure its soundness (pending further public consultation as required).**
-

Background and Work to Date

4. The District Plan 2014-2031, adopted in March 2018, sets out a commitment for the Council to prepare a Site Allocations Development Plan Document (the 'Sites DPD'). The following is a summary of the work undertaken to date in its preparation:
 - A Members' Site Allocations Working Group (SAWG) was set up by the Scrutiny Committee for Housing, Planning and Economic Growth in November 2017. SAWG met 16 times, advising the Scrutiny Committee at each milestone.

- A robust Site Selection Methodology was established in consultation with Town and Parish Councils, Neighbouring Authorities, and the Mid Sussex Developers' Liaison Group. It conforms to best practice, reflects expert legal advice and was overseen by SAWG before being considered by the Scrutiny Committee at meetings between July and November 2018.
 - The Site Selection process was applied to 241 housing sites and 18 employment sites, with assessments publicised in Site Selection Paper 3: Housing and Site Selection Paper 4: Employment, available online.
 - The assessments identified 47 housing sites for detailed consideration and further testing through the evidence base.
 - The further testing identified three options for housing site allocations. Council agreed on 25th September 2019 to proceed with option '2' for inclusion in the Sites DPD. This option ensures the residual housing need is fully met, provides flexibility, and a range of sites across a wide geographical area and a variety of sizes. The full justification can be found in the Council report to 25th September 2019, and the accompanying Sustainability Appraisal.
 - Council also agreed to proceed with 7 employment sites totalling 17.45ha of employment land. Of two Science and Technology Park options Council agreed to proceed with the site North of the A2300, which was selected as the preferred site.
 - In addition to the proposed sites, five policies necessary to support development (SA34-SA38) were proposed.
5. Consultation on the Regulation 18 Sites DPD commenced on 9th October and concluded on 20th November 2019. Just over 1,300 respondents commented on the document and supporting evidence (including the Sustainability Appraisal and Habitats Regulations Assessment).

Scrutiny Committee Consideration of the Consultation Responses

6. Scrutiny Committee for Housing, Planning and Economic Growth considered the consultation responses and agreed actions to address issues arising at its meeting on 22nd January 2020.
7. A detailed schedule of responses was made available in the Members' room and is still available online for Members to view. For purposes of clarification, although the Scrutiny Report noted that no objections had been received from Neighbouring Authorities, in fact some had made objections related to specific sites or policies. The summary of responses attached to the Committee Report was a correct summary and all comments have been carefully considered ahead of the Regulation 19 stage.
8. At its meeting on 11th March, Scrutiny Committee considered the further work and proposed changes to the Sites DPD following the Reg 18 Consultation. The changes are reflected within the submission draft (Regulation 19) Sites DPD. This can be summarised as follows (full details are set out in the Scrutiny Committee report):
- **Amendments to policy wording** - to add clarity or additional requirements to site policies, following comments received during consultation

- **Assessment of newly submitted housing and employment sites** – during consultation, 20 new housing sites and 8 new employment sites were submitted to the Council for consideration. These have been assessed using the same site selection process as all previous sites and corresponding updates have been made to Site Selection Papers 3 & 4. Following this assessment none of the additional sites submitted was concluded to be suitable for inclusion in the Sites DPD.
- **Assessment of ‘Omission Sites’** – during the consultation, 58 site promoters objected on the grounds that their sites, previously assessed through the Site Selection process, had not been selected for allocation and included in the Reg 18 Sites DPD. Most responses provided additional evidence in support of their proposals. Although factual errors have been corrected and sites re-assessed this work has not resulted in a change to the submission draft Sites DPD. Therefore, none of the 58 Omission Sites is proposed for inclusion in the submission draft Sites DPD.
- **High Weald AONB: ‘Major’ Impact Assessment** – In their response to the Regulation 18 consultation, Natural England and the High Weald AONB Unit required the Council to carry out an assessment to determine whether any of the proposed sites within the AONB could be defined as ‘major’ development, in accordance with para 172 of the NPPF. The 11th March Scrutiny Committee report details the findings of this assessment. Only the proposed allocation SA25: Selsfield Road, Ardingly (100 dwellings), was considered to be major development. An alternative proposal for 70 dwellings was re-assessed and this was not considered to be major. The yield for this site has therefore been reduced. The High Weald AONB Unit and Natural England have indicated that the revised allocation would significantly reduce the impact of the proposed development on the AONB and are happy with this approach.
- **Transport** – The Scrutiny Committee report of 11th March details the updated transport evidence that accompanies the submission draft Site Allocations DPD to address comments made during consultation. This includes a revised Strategic Transport Assessment (February 2020), prepared by transport consultants SYSTRA and in close co-operation with West Sussex County Council and Highways England given their technical expertise and responsibilities.

The transport evidence base was subject to detailed discussion at Scrutiny Committee on 11th March. Members asked detailed questions about the transport model and traffic impacts arising from individual sites. In response, Scrutiny Committee were informed that:

- The transport model has been validated by both WSCC and Highways England as being robust and fit for purpose.
- The test set out in National Planning Policy (NPPF: paragraph 109) is that development should only be prevented or refused on highways grounds where the impact of proposals in the Sites DPD would lead to a ‘severe’ impact on the road network when compared with the baseline position.
- Although it was recognised that there are existing issues on the transport network, the NPPF test is whether the sites proposed in the DPD would cause a ‘severe’ impact. New development proposed within the Sites DPD is not responsible for resolving pre-existing conditions.

- The Strategic Transport Assessment (February 2020) identifies the junctions that would result in 'severe' impacts due to the Sites DPD proposals, however the modelling indicates no 'severe' impacts arise once mitigations are considered.
 - Mitigation is required at the A23/A2300 to address severe impacts arising at this junction due to the proposed Science and Technology Park. A potential solution had been identified in principle, subject to detailed testing. The Council, WSCC, Highways England and the Science and Technology Park promoters continue to work together to assess the phasing of the mitigation and detailed design.
 - At the planning application stage, further detailed transport evidence will be provided. The Scrutiny Committee considered the proposed policy SA GEN in the submission draft (Regulation 19) Sites DPD which requires all Sites DPD allocations to provide a Transport Assessment and Sustainable Transport Strategy at planning application stage.
9. At its meeting on 11th March 2020, Scrutiny Committee reviewed the proposed amendments to the Sites DPD following consultation. The Scrutiny Committee resolved to recommend to Council that the submission draft Sites DPD (as set out in Appendix 1) should be subject to Regulation 19 consultation, ahead of submission to the Secretary of State, for examination.

Additional Work following Scrutiny Committee

10. Since Scrutiny Committee met in March, additional amendments to the submission draft (Regulation 19) Site Allocations DPD have been required to reflect ongoing work and further work with site promoters and stakeholders.

Update to the 'residual' housing requirement

11. The submission draft Sites DPD document considered by Scrutiny Committee in March 2020 contained the residual housing requirement 'as at April 2019'. The housing monitoring year runs April 1st to March 31st, therefore up-to-date figures 'as at April 2020' are now available. This has resulted in an update to the submission draft Sites DPD.
12. The Sites DPD is required to meet the residual housing figure to ensure that the District Plan Policy DP4 housing requirement is met in full. As at 1st April 2019 the residual figure was 1,507 dwellings. The updated figure as at April 2020 is now **1,280**. This accounts for additional housing completions and permissions/allocations (commitments) confirmed during the monitoring year 2019/20.
13. Whilst the residual figure has fallen, two proposed allocations are now committed sites. Site SA24: Land to the north of Shepherd's Walk, Hassocks (130 dwellings) received planning consent in 2019/20. The Slaugham Neighbourhood Plan was 'made' on 25th September 2019 allocating 30 dwellings at Site SA27: Land at St Martin Close, Handcross in the Neighbourhood Plan. Whilst these two sites will be retained as allocations within the Sites DPD, these 160 dwellings are now 'committed'. This means their yield will not be included in the Sites DPD supply, to avoid double-counting. The supply provided by the submission draft Site Allocations DPD is **1,764**.

14. This represents an over-supply of **484** compared to the residual requirement. Council agreed at its meeting on 25th September 2019 that an over-supply was necessary to provide resilience and flexibility.
15. A topic paper setting out the Council's housing land supply position will be prepared for the Examination.

Other Amendments to the submission draft Sites DPD since Scrutiny Committee (11th March 2020)

16. As a result of ongoing dialogue with site promoters and other consultees, some amendments to the wording of policy SA GEN and to some of the policies on individual sites have been made.
17. These amendments reflect discussions with the High Weald AONB Unit, South Downs National Park Authority and Natural England and improve the robustness of the policies by ensuring they follow best practice and guidance. Amendments have also been made to reflect ongoing joint working with both West Sussex and Surrey highways authorities. The changes are summarised on page 1 of the submission draft Site Allocations DPD at Appendix 1.

Sustainability Appraisal Report/Habitats Regulations Assessment

18. In accordance with legal requirements, a revised Sustainability Appraisal report and a Habitats Regulations Assessment have been prepared to consider the potential impacts of the submission draft Sites DPD.
19. Non-Technical Summaries of these are presented at Appendices 2 and 3 respectively. In accordance with the regulations, these will be published for public consultation alongside the Plan. Full versions of these are available as background documents, online at www.midsussex.gov.uk/SitesDPD.

Duty to Co-Operate

20. In accordance with the Duty to Co-operate, the Council has worked, and continues to work, in partnership with its neighbouring authorities.
21. The Sites DPD addresses how to meet the housing and employment need already established by the adopted District Plan. Strategic matters across the sub region will be considered during the review of the District Plan.
22. In accordance with the NPPF, the Council has prepared Statements of Common Ground with neighbouring authorities and statutory bodies.

Next Steps

23. Subject to Council approval, the submission draft Site Allocations DPD will be subject to public consultation for 8 weeks between 3rd August and 28th September 2020.
24. The report to Scrutiny Committee for Housing, Planning and Economic Growth on 11th March 2020 indicated that consultation would commence on 11th May 2020 for a six-week period. Due to the Covid-19 pandemic, legal advice related to consultation regulations during lockdown and Government guidance, the Council postponed consideration and consultation of the submission draft Sites DPD.

25. The Scrutiny report also set out a proposed approach to consultation, and a draft of the Community Involvement Plan (CIP). Following the Covid-19 pandemic, it is now necessary to amend the proposed approach to consultation to comply with the latest Government advice.

Approach to Consultation

26. The Council's approach to consultation is set out in the Statement of Community Involvement (SCI), which is a 'code of practice' for how the Council will engage in planning processes. Legislation requires the Council to comply with its SCI in preparing the Sita Allocations DPD. The SCI commits the Council to prepare a 'Community Involvement Plan' (CIP) for all planning policy documents. The Community Involvement Plan for the submission draft Sites DPD is at Appendix 4.
27. The Community Involvement Plan indicates that the Council will 'publish' the submission draft Sites Allocation DPD for public consultation for a minimum six week period. Due to the Covid-19 pandemic, it is considered that this consultation period should be extended to an eight-week period as a minimum and be kept under review. This will provide all stakeholders a greater opportunity to make their responses.
28. To comply with the regulations, the document will be available to view at the Council's offices on appointment. Full details will be communicated and advertised ahead of the consultation.
29. The Council usually places documents for inspection at Libraries and Help Points. It is understood that arrangements are in place to re-open libraries across the district before the consultation is due to commence. Therefore, it will be possible to view the documents at these locations all the time these facilities are open to the public. This will be kept under constant review and alternatives sought (and advertised) if circumstances change during the course of the consultation.
30. To ensure as many stakeholders as possible can be involved and engaged in the process, the following consultation methods will be used. These arrangements exceed those required by the regulations and SCI.
- Press release, email alert and utilise social media;
 - Documentation available on Council website including an on-line response form;
 - Letters or emails to specific consultation bodies (statutory consultees) and to other organisations listed in the Community Involvement Plan;
 - Letters or emails to all respondents to the Regulation 18 consultation
31. The CIP sets out the full approach. Although unlikely, due to the unprecedented circumstances it may need revision ahead of the consultation commencing, to reflect changes in Government guidance on the Covid-19 pandemic. Any changes to the CIP or consultation approach will be agreed in consultation with the Cabinet Member for Housing and Planning.

Additional Work Prior to Submission

32. To reflect the submission of additional sites to the Council during the consultation, there is a need to update the Strategic Housing and Economic Land Availability Assessment (SHELAA). A revised version including the 28 newly promoted housing and employment sites will be published ahead of submission.

33. It is best practice to prepare Topic Papers which summarise existing evidence and conclusions, and to prepare a self-assessment of the Plan against the legal requirements and tests of soundness to assist the Inspector during the examination of the plan. These will be prepared and published ahead of Submission of the document to the Secretary of State.

Submission and Examination

34. Following the close of the public consultation, the submission draft Sites DPD, accompanying documents and evidence base, and all consultation responses received at the Regulation 19 stage will be submitted to the Secretary of State. The Secretary of State will appoint an independent planning Inspector to examine the Site Allocations DPD.
35. The appointed Inspector will be examining the Sites DPD to ensure it meets legal and soundness tests. This will be done in writing as well as at public hearing sessions. It may be necessary for the Inspector to recommend amendments to the Sites DPD for it to be found 'sound' or to request the Council to suggest amendments for his/her consideration. These are known as "Main Modifications" – if these are required, they will be subject to public consultation. Once the Inspector has concluded in their report that the plan is 'sound', Council can formally adopt it. The Sites DPD will then form part of the development plan and be afforded full weight when making planning decisions.

Financial Implications

36. There is a budget for the submission and examination costs of the Sites DPD. This will be kept under review.

Risk Management Implications

37. As required by the District Plan Inspector the Sites DPD will identify housing sites to enable the Council to meet the housing requirement identified in Policy DP4: Housing of the District Plan. It will allocate sites to support the five-year housing land supply; without this, the Council would be vulnerable to speculative planning applications.
38. The allocation of additional employment sites will make an important contribution to the delivery of the Council's Economic Development Strategy.

Equality and Customer Service Implications

39. It is important that the Council allocates sites for housing and employment to maximise accessibility for all to decent housing and employment opportunities. An Equality Impact Assessment has been prepared to ensure opportunities to promote equality and/or barriers to service are considered and addressed.

Other Material Implications

40. There are no other material implications.

Appendices

1. Submission Draft Site Allocations DPD (Regulation 19)
2. Sustainability Appraisal: Non-Technical Summary (Regulation 19)
3. Habitats Regulations Assessment: Non-Technical Summary (Regulation 19)

4. Community Involvement Plan (Regulation 19)

Background Papers

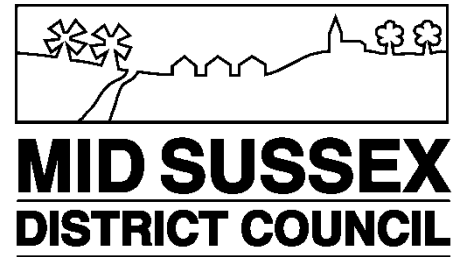
Available online at www.midsussex.gov.uk/SitesDPD.

1. Report to Scrutiny Committee for Housing, Planning and Economic Growth – March 11th 2020 (*this includes, as an Appendix, a 'Track Change' version of the Sites DPD showing the changes made as a result of the Regulation 18 consultation*)
2. Sustainability Appraisal (Regulation 19) – Full Report
3. Habitats Regulations Assessment (Regulation 19) – Full Report
4. Air Quality Assessment (February 2020)
5. Strategic Transport Assessment (February 2020)
6. Site Selection Paper 1 (February 2020)
7. Site Selection Paper 3: Housing (February 2020)
8. Site Selection Paper 4: Employment (February 2020)
9. AONB Major Development Topic Paper
10. Draft Infrastructure Delivery Plan (February 2020)
11. Windfall Study Update (July 2020)
12. Viability Assessment Report
13. Equalities Impact Assessment

Previous Reports relating to the Sites DPD are available online:

- **Council – 25th September 2019**
<http://midsussex.moderngov.co.uk/ieListDocuments.aspx?CId=139&MId=2249&Ver=4>
- **Scrutiny Committee for Housing, Planning and Economic Growth – 22nd January 2020**
<http://midsussex.moderngov.co.uk/ieListDocuments.aspx?CId=284&MId=2314&Ver=4>
- **Scrutiny Committee for Housing, Planning and Economic Growth – 11th March 2020**
<http://midsussex.moderngov.co.uk/ieListDocuments.aspx?CId=284&MId=2379&Ver=4>

Mid Sussex



Site Allocations Development Plan Document

Submission Draft (Regulation 19)

Council – 22nd July 2020

Note:

The submission draft Sites DPD (Regulation 19) was discussed by Scrutiny Committee for Housing, Planning and Economic Growth on March 11th 2020. As a result of ongoing dialogue with site promoters and other consultees since this date, the following amendments have been made:

- Update to the residual housing requirement (SA10) as a result of one further monitoring year (2019/20) – figures now updated ‘at 1st April 2020’.
- Typographical / Formatting and mapping errors amended
- Amendment to SA GEN to include criteria relating to landscape considerations following further work with South Downs National Park
- Amendment to SA GEN and site-specific policies relating to biodiversity following further work with Natural England to reflect current guidance.
- Amendment to SA13 ‘Urban Design Principles’ to better identify the character of the location following further work with South Downs National Park Authority
- Amendment to SA16: under ‘Social and Community’ requirements to clarify the uses identified include those in the Burgess Hill Neighbourhood Plan allocation for The Brow Quarter (BHNP TC3). ‘Highways and Access’ to be consistent with other larger sites, a specific requirement to maximise sustainable transport enhancement prior to highway mitigation measures has been included.
- SA18 ‘Urban Design Principles’, includes additional requirement to ensure the design does not prejudice future redevelopment opportunities on the adjacent former Court House site.
- SA19 and SA20 ‘Highways and Access’ specific reference has now been made to working collaboratively with both Surrey and West Sussex County Council Highway Authorities to mitigate development impacts arising from the scheme.
- SA25 ‘Objectives’ amended to be consistent with AONB legislation to conserve and enhance landscape character.
- SA31 ‘Biodiversity and Green Infrastructure’ updated to reflect national change in designation from Site of Nature Conservation Importance (SNCI) to Local Wildlife Site (LWS).
- SA32 ‘AONB’ following consultation with the High Weald AONB Unit, amendments to clarify that development should avoid areas of the site that are higher and more visible to conserve and enhance landscape views. ‘Historic Environment and Cultural Heritage’ amended to focus development on areas with existing and previous historic built form.

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Foreword

To be added to Final Version

Executive Summary

Introduction

This document is the Regulation 19 ‘submission draft’ of the emerging Site Allocations Development Plan Document (the Sites DPD) that is published for six weeks consultation prior to submission to the Government for consideration which is scheduled for Autumn 2020.

The District Plan, adopted in March 2018, sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

This Regulation 19 submission draft Sites DPD was prepared following a six-week consultation period, between 9 October and 20 November 2019, which allowed interested members of the public, Town or Parish Councils and other interested stakeholders and organisations to provide any comments to assist in the preparation of the document. This document has been prepared following careful consideration of the comments made. It will be subject to a further round of consultation in August-September 2020, comments made at this stage will be submitted to the Planning Inspector alongside the plan and accompanying evidence.

Site Allocations

District Plan Policy DP1: Sustainable Economic Development sets out a commitment to allocate further employment sites within the Sites DPD. The Sites DPD Policy **SA1: Sustainable Economic Development – Additional Site Allocations** allocates six additional sites for employment use, plus expansion at Bolney Grange Business Park, totalling approximately 17ha.

Sites DPD Policies **SA2 – SA8** contain policies for each employment site allocation. These sites are listed below.

Settlement/ Parish	Site Name	Policy Reference
Burgess Hill	Burnside Centre, Victoria Road	SA2
	Site of Former KDG, Victoria Road	SA3
Copthorne	Land north of the A264 at Junction 10 of M23	SA4
Bolney	Land at Bolney Grange Business Park	SA5
	Marylands Nursery, Cowfold Road	SA6
Pease Pottage	Cedars, Brighton Road	SA7
	Pease Pottage Nurseries, Brighton Road	SA8

District Plan Policy DP1: Sustainable Economic Development identifies a broad location for a Science and Technology Park to the west of Burgess Hill. **SA9: Science and Technology Park** allocates a specific site, north of the A2300, for a Science and Technology Park.

The Sites DPD Policy **SA10: Housing** updates and complements District Plan Policy DP 4: Housing and provides context for the residual necessary for the Sites DPD to address.

The Sites DPD Policy **SA11: Additional Housing Allocations** identifies the sites that are allocated to meet the residual housing requirement addressed by the Sites DPD. **SA12 – SA33** contain policies for each housing site allocation. These sites are listed below.

Settlement/ Parish	Site Name	Policy Reference
Burgess Hill	Land South of 96 Folders Lane	SA 12
	Land South of Folders Lane and East of Keymer Road	SA 13
	Land South of Selby Close	SA 14
	Land South of Southway	SA 15
	St.Wilfrid's School	SA 16
	Woodfield House, Isaacs Lane	SA 17
East Grinstead	Former East Grinstead Police Station	SA 18
	Land South of Crawley Down Rd	SA 19
	Land South and West of Imberhorne Upper School	SA 20
Haywards Heath	Land at Rogers Farm, Fox Hill	SA 21
Crawley Down	Land North of Burleigh Lane	SA 22
Cuckfield	Land at Hanlye Lane East of Ardingly Road	SA 23
Hassocks	Land North of Shepherds Walk	SA 24
Ardingly	Land West of Selsfield Road	SA 25
Ashurst Wood	Land South of Hammerwood Road	SA 26
Handcross	Land at St. Martin Close (West)	SA 27
Horsted Keynes	Land South of The Old Police House	SA 28
	Land South of St. Stephens Church	SA 29
Sayers Common	Land to the North of Lyndon, Reeds Lane	SA 30
Scaynes Hill	Land to the rear of Rear of Firlands, Church Road	SA 31
Turners Hill	Withypitts Farm, Selsfield Road	SA 32
Ansty	Ansty Cross Garage	SA 33

Development Policies

In addition to the Sites DPD policies relating to site allocations, the District Plan policies are complemented by five additional strategic policies. These policies help to ensure that the Development Plan supports the delivery of sustainable development when considered as a whole.

The additional policies included within the Sites DPD cover the following areas:

- **SA34: Existing Employment Sites** provides additional policy requirements relating to the protection of existing employment sites, whilst supporting their expansion where appropriate.
- **SA35: Safeguarding of Land for Strategic Highway Improvements** provides an additional policy to safeguard land to support the delivery of transport schemes, identified in relation to the Sites DPD, to ensure that proposed development is sustainable.

- **SA36: Wivelsfield Railway Station** provides a policy which safeguards Land to the west of Wivelsfield Railway Station to support the delivery of a package of improvements at Wivelsfield Railway Station.
- **SA37: Burgess Hill/ Haywards Heath Cycle Network** provides a policy for the Burgess Hill/ Haywards Heath Multifunctional Network which supports the delivery of a programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill.
- **SA38: Air Quality** provides additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs. It also addresses potential air quality impacts for the Ashdown Forest SPA and SAC.

Implementing the Plan

Implementation and monitoring are an essential component of the plan-making process. A monitoring schedule is included which sets out a range of indicators that assess whether the policies of the DPD are achieving the objectives and intended policy outcomes, whether they are having any unintended consequences and whether they are still relevant or require a review.

Purpose of this Consultation

The District Plan, adopted in March 2018, sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:

- 1) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- 2) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- 3) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- 4) to set out additional Strategic Policies necessary to deliver sustainable development.

A draft Site Allocations Development Plan Document (the draft Sites DPD) was subject to consultation during October – November 2019. Comments received during the consultation period have been carefully considered, and amendments made to the Sites DPD where required which are reflected in this document.

This document represents the next stage in the DPD process, 'Regulation 19'. It is the version of the Sites DPD that the Council intends to submit to the Secretary of State, for independent examination, following an eight-week consultation to allow interested members of the public, Town or Parish Councils and other interested stakeholders and organisations to provide any comments. Following the close of the consultation period, all comments will be submitted to the Planning Inspector alongside the Sites DPD and supporting evidence.

How to Comment on this Consultation

This Sites DPD will be made available for an eight-week consultation from 3rd August to 28th September 2020. The document will be available on the Council website and deposited at locations set out in the Community Involvement Plan (available to view online at www.midsussex.gov.uk/SitesDPD). Further details of the Council's approach to consultation are explained in the Community Involvement Plan.

If you wish to comment on these documents, these should be sent to:

E-mail: LDFConsultation@midsussex.gov.uk

Online: www.midsussex.gov.uk/SitesDPD

Post: Planning Policy and Economic Development
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

1. Introduction

What is the Site Allocations Development Plan Document?

1.1 The Mid Sussex District Plan 2014-2031, adopted on 28 March 2018, provides a policy framework for the delivery of sustainable development across the district. It sets out the housing requirement for the district up to 2031 and will be complemented by the Site Allocations Development Plan Document (the Sites DPD). The main role of these documents is summarised below:

- **District Plan 2014-2031:** The District Plan sets out the Spatial Strategy and Strategic Policies for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area for the plan period up to 2031. It makes provision for retail, leisure and commercial development and for the infrastructure needed to support them.

The District Plan sets out the Spatial Strategy for the location of development across the district and allocates large-scale development sites. It includes district-wide policies to ensure that development contributes to meeting the Strategic Objectives of the plan, such as policies relating to the natural and historic environment.

- **Site Allocations Development Plan Document:** The Sites DPD allocates additional development sites to meet the residual necessary to meet the agreed housing requirement for the plan period as reflected in the District Plan 2014-2031. The additional allocations are in accordance with the Spatial Strategy and Strategic Policies set out in the District Plan.

The Sites DPD also allocates additional employment sites, a Science and Technology Park to the west of Burgess Hill and sets out additional Strategic Policies for the district, to complement those set out in the District Plan to deliver sustainable development.

- **Policies Map:** This shows the sites identified for development and areas where particular policies apply. It will be updated as each part of the Development Plan is adopted. A draft Policies Map accompanies this submission draft Sites DPD – this indicates any changes to the adopted (District Plan) policies map that would result from the allocations and policies within the Sites DPD. It also includes additions to the built-up area to reflect completed and committed development, as set out in the Policies Map Topic Paper.

1.2 The Council's Local Development Scheme (LDS) sets out the timetable for preparing the Council's Development Plan Documents (DPD's) and is available on the Council's website.¹

The Development Plan

1.3 The District Plan 2014-2031 and Sites DPD will be used to inform decisions on planning applications across the district, in conjunction with any DPD's relating to minerals and waste prepared by West Sussex County Council and any 'made' neighbourhood plans prepared by the community.

¹ Available at: <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/#topic-the-local-development-scheme>

- 1.4 These documents are complemented by the remaining ‘saved’ policies of the Mid Sussex Local Plan (May 2004) and the Mid Sussex Small Scale Housing Allocations DPD (April 2008).
- 1.5 Neighbourhood Plans can be prepared by either town or parish councils, or a neighbourhood forum, and where adopted, also make up part of the Development Plan of the district. They can provide an important layer of planning for local areas and set out in more detail how a community wishes to see its area develop.
- 1.6 Where neighbourhood plans are prepared, they must be in general conformity with the Strategic Policies set out in the District Plan and Site Allocations DPD, i.e. District Plan (DP) Policies and Site Allocations (SA) Policies, and any Strategic Policies set out in future planning documents in accordance with the Neighbourhood Planning (General) Regulations 2012.²
- 1.7 The Council will continue to support communities who wish to prepare neighbourhood plans. Details of how the Council can help with the preparation of neighbourhood plans are set out on the Council’s website.³
- 1.8 These documents together make up the Development Plan for the district (see Figure 1.1). All planning applications will be determined in accordance with the Development Plan taken as a whole, unless material considerations indicate otherwise.
- 1.9 The Council has also prepared a number of Supplementary Planning Documents (SPDs). These provide additional detail and guidance to existing policies. SPDs are a material consideration in planning decisions. Adopted SPDs are available to view online at <https://www.midsussex.gov.uk/planning-building/supplementary-planning-documents/>

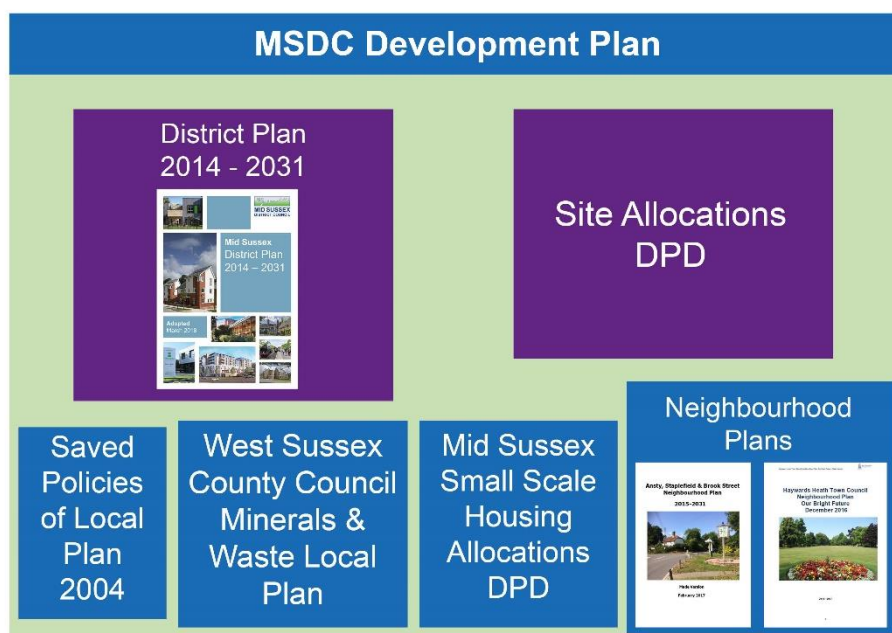


Figure 1.1: MSDC Development Plan

² *The Neighbourhood Planning (General) Regulations 2012*

³ Available at: <https://www.midsussex.gov.uk/planning-building/neighbourhood-plans/>

How the Sites DPD has been Prepared

- 1.10 The Sites DPD has been prepared in compliance with the Planning and Compulsory Purchase Act 2004,⁴ and other relevant regulations.
- 1.11 Government planning policy and guidance is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The NPPF sets out the Government’s planning policies for achieving sustainable development and is complemented by the PPG, which provides additional guidance for practitioners.
- 1.12 In particular, the NPPF states that Development Plan Documents should be prepared in accordance with the legal and procedural requirements. To be found to be ‘sound’, Plans must be:
 - a) positively prepared
 - b) justified
 - c) effective, and
 - d) consistent with national policy.⁵

The Council has prepared the Sites DPD in line with these requirements as set out below.

a) Positively Prepared

- 1.13 The NPPF states that plans are sound if they are:

“positively prepared - providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”
- 1.14 The Council has worked, and continues to work, in partnership with its neighbouring authorities under the Duty-to-Cooperate and has undertaken an ongoing process of Sustainability Appraisal to ensure that the Site Allocations Document delivers sustainable development.
- 1.15 The Sites DPD identifies additional site allocations to meet the objectively assessed development requirements for the district, plus the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area (HMA) to be addressed within Mid Sussex.
- 1.16 The Sites DPD is addressing the housing and employment need which has already been established by the District Plan and therefore these matters are not addressed in the Duty-to-Cooperate matters in the context of the Site Allocations document itself. Clearly these matters will be reviewed again in the future through the District Plan review process, which is scheduled to commence in 2020.
- 1.17 Other important Duty to Co-operate matters for Mid Sussex include giving consideration to potential impacts on the South Downs National Park, High Weald Area of Outstanding Natural Beauty (AONB) and the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The National Park Authority, AONB Board and Natural England have all been engaged during the

⁴ *Planning and Compulsory Purchase Act 2004*

⁵ *National Planning Policy Framework (NPPF)*. (2019). para. 35.

preparation of the plan and details of this are set out within the supporting papers and Habitats Regulations Report.⁶ It is considered that the plan does not negatively affect these matters.

- 1.18 Planning for strategic infrastructure, particularly for highways, is an important consideration, including for the Sites DPD, and the Council continues to work with West Sussex County Council as Highways Authority, Highways England, and other stakeholders. This matter is discussed in more detail in Section 3 of this document.

b) A justified plan:

- 1.19 The NPPF states that plans are sound if they are:

“justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”

- 1.20 The Sites DPD complements the District Plan 2014-2031 and the additional allocations are consistent with the Strategic Policies set out in the District Plan, including the Settlement Hierarchy. The District Plan was based on a comprehensive understanding of the issues facing the district and this baseline has been updated to inform the Sites DPD.

- 1.21 A series of reasonable alternatives were developed and considered to inform the Sites DPD. The reasonable alternatives have been assessed through the Sustainability Appraisal (SA), which is described further below.

c) An effective plan:

- 1.22 The NPPF states that plans are sound if they are:

“effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground” .

- 1.23 To ensure the additional site allocations are realistic, deliverable and viable the Council has worked closely with landowners and developers to confirm that the additional development sites being allocated are deliverable. A Viability Study has been published alongside the Sites DPD.⁷

- 1.24 The Council has worked closely with a range of organisations and key stakeholders such as West Sussex County Council, who are responsible for providing or managing key services, including education and transport, and the Environment Agency, Natural England and Historic England. A number of Statements of Common Ground have been prepared with a series of key stakeholders and these are published alongside a Topic Paper summarising the Council’s approach to meeting its commitments under the Duty-to-Cooperate.

⁶ Mid Sussex District Council. (2020). *Site Allocation Development Plan Document, Site Selection Paper 3: Housing Sites.*

Mid Sussex District Council. (2020). *Duty to Cooperate Statement. Habitats Regulations Assessment of the Mid Sussex Site Allocations Development Plan Document at Draft Plan Stage.* (2020).

⁷ Mid Sussex District Council (2020) Site Allocations Document – Viability Review.

d) Consistent with National Policy:

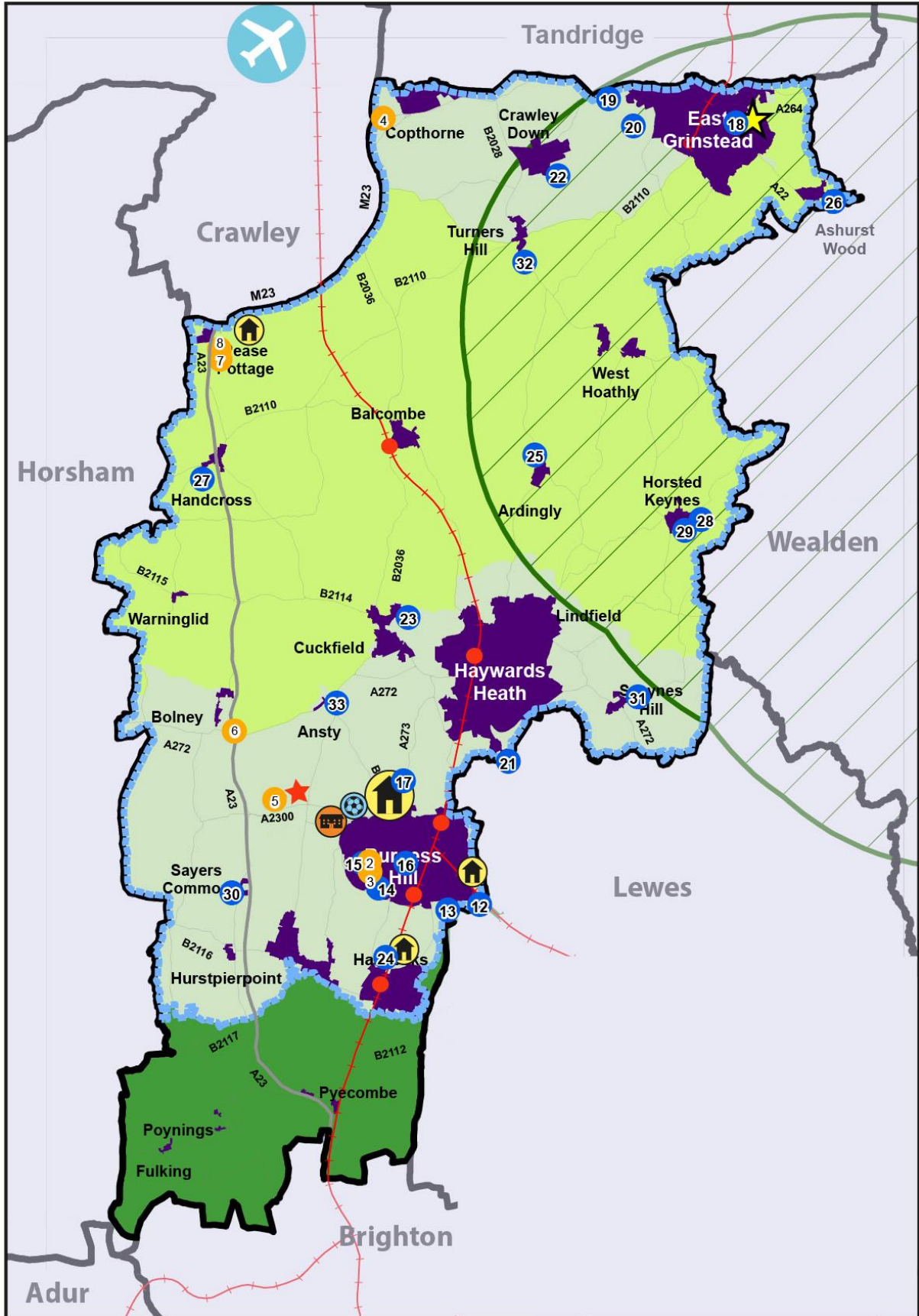
1.25 The NPPF states that plans are sound if they are:

“consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework”

1.26 The preparation of the Sites DPD has involved the testing of reasonable alternatives through Sustainability Appraisal (SA) that incorporates a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA). Both reports have been published alongside this document.

2. Site Allocations





FIGURE 2.1: Key Diagram



Key

Site Allocations DPD Proposed Allocations





















Employment Site Allocations

	SA2	Burnside Centre, Victoria Road
	SA3	Site of Former KDG, Victoria Road
	SA4	Land north of the A264 at Junction 10 of M23
	SA5	Land at Bolney Grange Business Park
	SA6	Marylands Nursery, Cowfold Road
	SA7	Cedars, Brighton Road
	SA8	Pease Pottage Nurseries, Brighton Road




Science and Technology Park

	SA9	Land to the north of the A2300
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






Housing Site Allocations

	SA12	Land South of 96 Folders Lane
	SA13	Land South of Folders Lane and East of Keymer Road
	SA14	Land South of Selby Close
	SA15	Land South of Southway
	SA16	St. Wilfrid's School
	SA17	Woodfield House, Isaacs Lane
	SA18	Former East Grinstead Police Station
	SA19	Land South of Crawley Down Road
	SA20	Land South and West of Imberhorne Upper School
	SA21	Land at Rogers Farm, Fox Hill
	SA22	Land North of Burleigh Lane
	SA23	Land at Hanlye Lane East of Ardingly Road
	SA24	Land North of Shepherds Walk
	SA25	Land West of Selsfield Road
	SA26	Land South of Hammerwood Road
	SA27	Land at St. Martin Close (West)
	SA28	Land South of The Old Police House
	SA29	Land South of St. Stephens Church
	SA30	Land to the North of Lyndon, Reeds Lane
	SA31	Land to the rear of Rear of Firlands, Church Road
	SA32	Withypitts Farm, Selsfield Road
	SA33	Ansty Cross Garage

District Plan Policies

-  Proposed strategic housing allocation (DP8, DP9, DP10 and DP11)
-  Proposed employment (DP9)
-  Centre for Outdoor Sport (DP9)

Constraints

-  Plan Area
-  Railway line
-  District Boundaries
-  Built Up Area Boundaries
-  East Court & Ashplats Wood, East Grinstead Strategic SANG (DP17)
-  Ashdown Forest 7km Zone of Influence (DP17)
-  High Weald Area of Outstanding Natural Beauty (DP16)
-  South Downs National Park
-  Protection and Enhancement of Countryside (DP12)

General Principles for Site Allocations

- 2.1 Policy SA GEN: General Development Principles for Site Allocations provides an overview of the District Plan requirements that are relevant for all the sites along with requirements set out in Council Supplementary Planning Documents (SPDs), planning guidance or strategy documents that may relate to the development of a site and which should be addressed in detail at the planning application stage. These General Principles apply to all site allocations and are supplemented by site-specific requirements set out for each policy SA2-SA9 (employment) and SA12-SA33 (housing).
- 2.2 The Sites DPD is accompanied by an Infrastructure Delivery Plan (IDP). The provision of infrastructure is essential to support new homes, economic growth and the creation of sustainable communities. The IDP identifies the future infrastructure requirements as a result of anticipated future growth proposed within the Sites DPD. It sets out the likely infrastructure requirements and estimated contributions for each proposed site allocation based on engagement with infrastructure providers and key stakeholders (for example, West Sussex County Council, the Clinical Commissioning Group and utility providers).

SA GEN: General Principles for Site Allocations

Key Objectives

- Contribute towards necessary infrastructure provision, including transport, education, health, community and leisure facilities as required by District Plan Policy **DP20: Securing Infrastructure**, the **Mid Sussex Infrastructure Delivery Plan (IDP)** and the **Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (SPD)**.
- Provide 30% affordable housing and a suitable mix of housing in line with District Plan Policies **DP30: Housing Mix** and **DP31: Affordable Housing** and the **Mid Sussex Affordable Housing SPD**.

Urban design principles

- Design new development in accordance with District Plan Policy **DP26: Character and Design** and with the design principles set out in the **Mid Sussex Design Guide SPD**.
- Sites within the High Weald AONB are to have regard to the **High Weald Housing Design Guide**.
- Provide a high degree of integration and connectivity between new and existing communities.
- Design new development at a density that is appropriate for the location.
- Make a positive contribution towards local character and distinctiveness.
- Create safe communities through appropriate design and layout that reduces the likelihood of crime and anti-social behaviour.

Landscape considerations

- Undertake Landscape and Visual Impact Assessment or Appraisal (LVIA) on any rural and edge of settlement sites. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements.
- Development in the High Weald AONB or within its setting will need to conserve and enhance the natural beauty and special qualities of the High Weald, as set out in the

High Weald Management Plan 2019-2024 and District Plan Policy DP16: High Weald Area of Outstanding Natural Beauty.

- Development within the setting of the South Downs National Park will need to be consistent with National Park purposes and special qualities, as set out in the **South Downs Local Plan** and **South Downs Partnership Management Plan** and with District Plan Policy **DP 18: Setting of the South Downs National Park**.
- Provide a Landscape Strategy to identify how natural features on site have been retained and incorporated into the landscape structure and design of the site and informed the landscaping proposals for the site.
- Where development is required to adopt a landscape led approach; this includes respecting the local character of the area in built form by utilising appropriate architectural design, site layout and density which complements and contributes to the overall character and appearance of the area.
- Arboricultural Impact Assessment and Arboricultural Method Statements will be required for all sites where development will be within 5 metres of any trees.

Social and community

- Contribute towards education capacity (early years, special education needs, primary, secondary and sixth form) in accordance with District Plan Policy **DP20: Securing Infrastructure**, the **Mid Sussex Site Allocations IDP** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.
- Contribute towards public open space, recreational and community facilities in accordance with District Plan policy **DP24: Leisure and Cultural facilities**, **DP25: Community Facilities and Local Services**, the **Mid Sussex Site Allocations IDP**, the **Draft Mid Sussex Play and Amenity Greenspace Strategy**, **Draft Playing Pitch Strategy**, **Draft Community Buildings Strategy** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.
- Contribute towards health care provision, where appropriate, in accordance with District Plan Policy **DP20: Securing Infrastructure** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.

Historic environment and cultural heritage

- Undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted, unless it can be demonstrated that such an evaluation is not appropriate for this site. Appropriate mitigation may be required depending on the outcome of that evaluation.
- Respect listed buildings, conservation areas, scheduled monuments, registered parks and gardens and their settings and look for opportunities to enhance or better reveal their significance. All heritage assets, including those that are undesignated, will need to be conserved and enhanced.
- Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies in accordance with District Plan policies **DP34: Listed Buildings and other Heritage assets**, **DP35: Conservation Areas** and **DP36: Historic Parks and Gardens**.

Air Quality, Light, Noise and Amenity

- Investigate any potential adverse air, light and noise pollution impacts from the development itself and from neighbouring uses, ensuring that these are avoided, or appropriately mitigated, in accordance with District Plan Policy **DP29: Noise, Air and**

Light Pollution and SA38 relating to Air Quality as set out in this Site Allocations DPD.

Biodiversity and Green Infrastructure

- Carry out habitat and species surveys at the earliest opportunity in order to conserve important ecological assets from negative direct and indirect effects.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy **DP38: Biodiversity**.
- Protect and enhance Green Infrastructure (GI) and corridors by ensuring built development avoids and integrates existing GI into the layout of the scheme, reinforcing and providing new connections to existing corridors to develop a connected network of multi-functional greenspace.
- Improve access to, and understanding of natural greenspace and nature conservation features, including recognising the importance and role of green infrastructure to the ecosystem, biodiversity, public rights of way, health and well-being, the water environment, community facilities and climate change. Green Infrastructure is to be incorporated with SuDS, where possible, to improve biodiversity and water quality.

Access and highways

- Ensure development contributes towards delivering sustainable development and appropriate infrastructure in accordance with District Plan Policy **DP21: Transport** and the objectives of the **West Sussex Transport Plan 2011 – 2026**.
- Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.
- Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant local network) have been fully explored and have been taken into account in terms of their level of mitigation.
- Identify how the development will provide safe and convenient routes for walking and cycling through the development and linking with existing networks beyond. Create a permeable road network within the site with clearly defined route hierarchies.
- Safeguard Public Rights of Way (PRoW) and protect their amenity.
- Provide adequate car parking in accordance with District Plan Policy **DP21: Transport**.

Flood risk and drainage

- Provide a site-specific Flood Risk Assessment (FRA)/surface water drainage strategy in areas at risk from fluvial or surface water flooding to inform the site layout and any appropriate mitigation measures that may be necessary. Areas at risk of flooding should be avoided in the first instance.
- Undertake a sequential approach to site layout by avoid developing areas at risk of flooding including climate change allowance.

- Priority will be given to use of Sustainable Urban Drainage Systems (SuDS) principles and methods where possible to drain the surface water from the development. SuDS features shall be designed and managed to provide, where possible, an ecological and water quality enhancement, providing areas for amenity and recreation, in accordance with District Plan Policy **DP41: Flood Risk and Drainage** and the **West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water** and the **Mid Sussex Drainage Advice for Developers**.

Ashdown Forest

- Developments resulting in a net increase in dwellings within the 7km zone of influence around the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) will require mitigation in order to prevent adverse effects on the Forest and shall accord with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

Utilities

- Liaise with water, gas and electricity providers to ensure that appropriate works are carried out if needed.
- Demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users in accordance with District Plan policy **DP42: Water Infrastructure and the Water Environment**.

Sustainability

- Design development to be resilient to climate change, minimise energy and water consumption and mitigate against flood risk in line with **DP39: Sustainable Design and Construction**, **DP41: Flood Risk and Drainage** and **DP42: Water Infrastructure and the Water Environment**.
- Address sustainability at the conception stage of development proposals to exploit the benefits of passive design and orientation, fabric performance, energy efficiency measures and low carbon solutions; and wherever possible include on-site low or zero carbon technologies in accordance with District Plan policies **DP39: Sustainable Design and Construction** and **DP40: Renewable Energy Schemes**.

Contaminated Land

- Investigate any potential land contamination from present or historical on site or adjacent land uses.

Minerals Safeguarding

- Consult with West Sussex County Council regarding any applications for development in a Minerals Safeguarding Zone or Consultation Area and address the requirements of **Policy M9 West Sussex Joint Minerals Local Plan – 2018**.

Sustainable Economic Development

- 2.3 District Plan Policy **DP1: Sustainable Economic Development** seeks to support economic growth across the district to promote a place which is attractive to a full range of businesses; which provides opportunities for people to live and work in their community; and to deliver an estimated job growth of an average of 543 jobs per year for the period 2014-2031. DP1 describes how this requirement will be met and this includes encouraging the provision of high-quality development of land and premises to meet the needs of 21st century businesses and encouraging inward investment.
- 2.4 Policy DP1 also allocated 25 hectares of land at Burgess Hill and set out a commitment to allocate further sites within the Sites DPD.
- 2.5 Employment projections are based on a number of factors and so they are sensitive to change, such as changes in the jobs and employment market and the impact of national policy/legal interventions such as Permitted Development for office to residential conversions.⁸
- 2.6 Updated employment evidence commissioned by the Council to take account of updated employment forecast statistics identified a total requirement of around **35 to 40 hectares** is needed up to 2031.⁹
- 2.7 District Plan Policy DP1 allocated 25ha at Burgess Hill:
- **15ha** on a site named “The Hub”. This allocation is partly complete, with planning applications in place to deliver the remainder.
 - **10ha** at the Northern Arc strategic development.
- 2.8 Since adoption of the District Plan in 2018, the approved masterplan for the Northern Arc concluded that it is only possible to bring forward 4ha of employment land within the site. However, two additional sites (Former Handcross Garden Centre, Handcross – 2.7ha; and Land west of Copthorne - 3.6ha) have received planning permission. This effectively makes up for the shortfall in employment land expected at the Northern Arc.
- 2.9 This therefore leaves a residual requirement of 10-15 hectares to be allocated within the Site Allocations Document.
- 2.10 The Sites DPD Policy **SA1: Sustainable Economic Development – Additional Site Allocations** allocates six additional sites for employment use, plus expansion at Bolney Grange Business Park, totalling approximately 17ha. The process for selecting these sites for allocation is set out in Site Selection Paper 4: Employment and Sustainability Appraisal.¹⁰

⁸ *The Town and Country Planning (General Permitted Development) (England) Order 2015*

⁹ *Mid Sussex District Council. (2020). Site Allocations Development Plan Document, Site Selection Paper 4: Employment Sites.*

¹⁰ *Mid Sussex District Council. (2020). Site Allocations Development Plan Document, Site Selection Paper 4: Employment Sites.*

Mid Sussex District Council. (2020). Site Allocations DPD, Sustainability Appraisal.

SA1: Sustainable Economic Development – Additional Site Allocations

The strategy for economic development in Mid Sussex is set out in District Plan Policy **DP1: Sustainable Economic Development** that supports the delivery of an average of 543 jobs per year and allocates 25 hectares of employment land at Burgess Hill to the east of Cuckfield Road to assist meeting this requirement.

This policy complements DP1 and allocates 17.45 hectares on seven additional sites for specified employment uses (Table 2.1) and indicated on the policies map. Employment development will be supported at the additional employment site allocations where:

- proposals follow a comprehensive approach involving the community, local planning authority, developer and other key stakeholders; and
- where development meets the requirements set out within **SA GEN: General Principles for Site Allocations** and the Policy Requirements (Policies SA 2 to SA8) shown on the following pages; and
- are in accordance with the Development Plan taken as a whole.

Table 2.1: Additional Employment Site Allocations

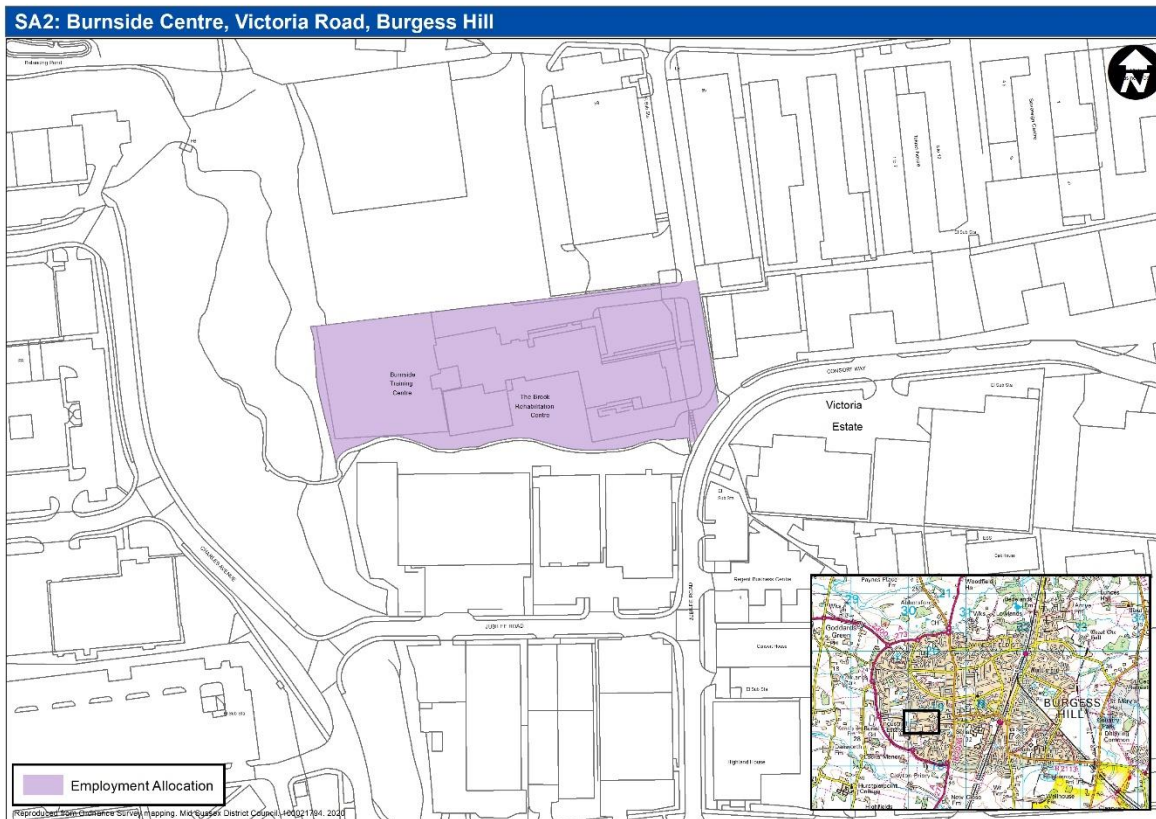
Settlement Type	Settlement/ Parish	Policy Reference	Site Name	Employment Uses	Available Development land (hectares)
Category 1 - Town	Burgess Hill	SA2	Burnside Centre, Victoria Road	B1/B2	0.96
		SA3	Site of Former KDG, Victoria Road	B1/B2	1.1
Category 2 – Larger Village (Local Service Centre)	Copthorne	SA4	Land north of the A264 at Junction 10 of M23	B1/B8	2.7
Category 3 - Medium Sized Settlement	Bolney (and part Hurstpierpoint and Sayers Common)	SA5	Land at Bolney Grange Business Park	B1/B2/B8	7
		SA6	Marylands Nursery, Cowfold Road	B8	2.4
	Pease Pottage	SA7	Cedars, Brighton Road	B1/B2/B8	2.3
		SA8	Pease Pottage Nurseries, Brighton Road	B1/B2/B8	1
Total					17.45

SA2: Burnside Centre, Victoria Road, Burgess Hill

SHELAA: 826

Parish: Burgess Hill

Developable Area (ha): 0.96



Allocation:

Employment land within use classes B1 (Business/Light Industrial) and B2 (General Industrial) are appropriate for this site, and proposals for these uses will be supported.

Site Specific Requirements:

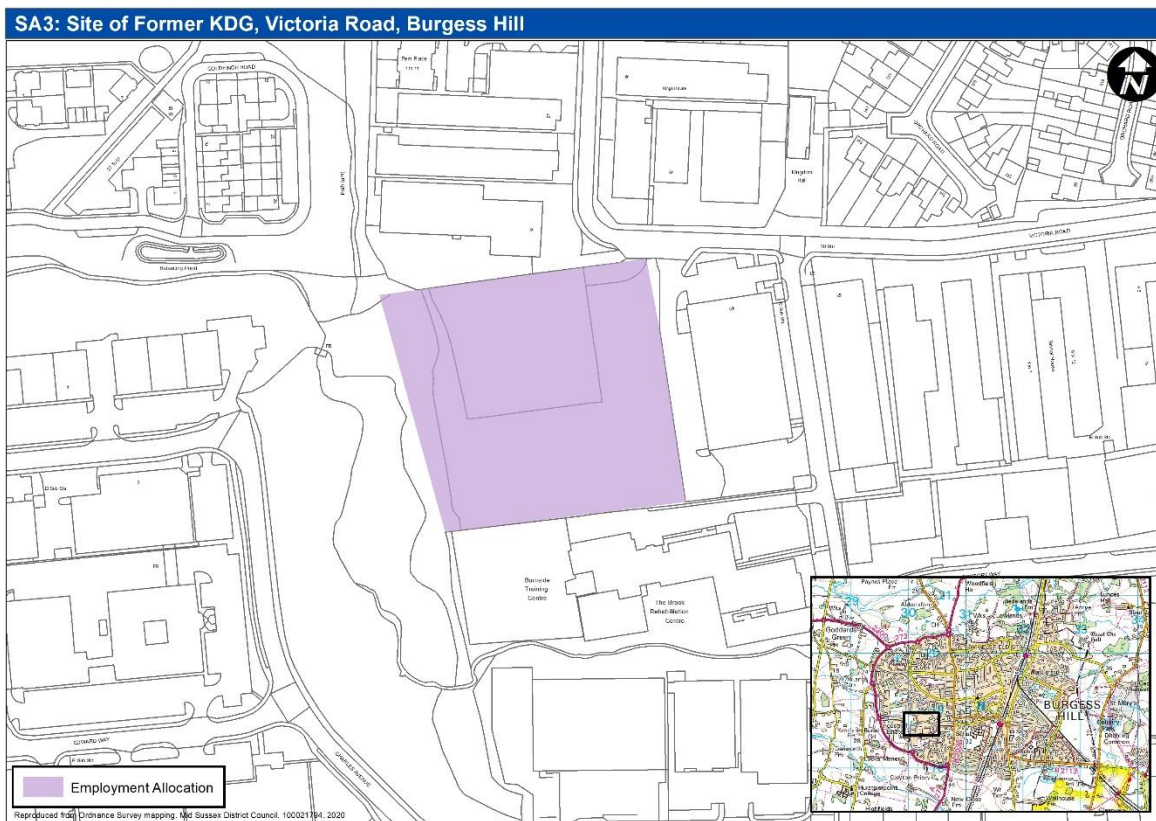
- Proposals must demonstrate that there is a mix of B1/B2 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- This site is currently used as a centre for adults with learning difficulties. Development of this site should not commence until a replacement facility has been found, or it can be demonstrated that the current use is no longer viable or required.
- A site-specific Flood Risk Assessment will be undertaken to inform the site layout and any appropriate mitigation measures that may be necessary. No development shall take place within 8 metres of the main river.

SA3: Site of Former KDG, Victoria Road, Burgess Hill

SHELAA: 912

Parish: Burgess Hill

Developable Area (ha): 1.1



Allocation:

Employment land within use classes B1 (Business/Light Industrial) and B2 (General Industrial) are appropriate for this site, and proposals for these uses will be supported.

Proposals must demonstrate that there is a mix of B1/B2 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.

Site Specific Requirements:

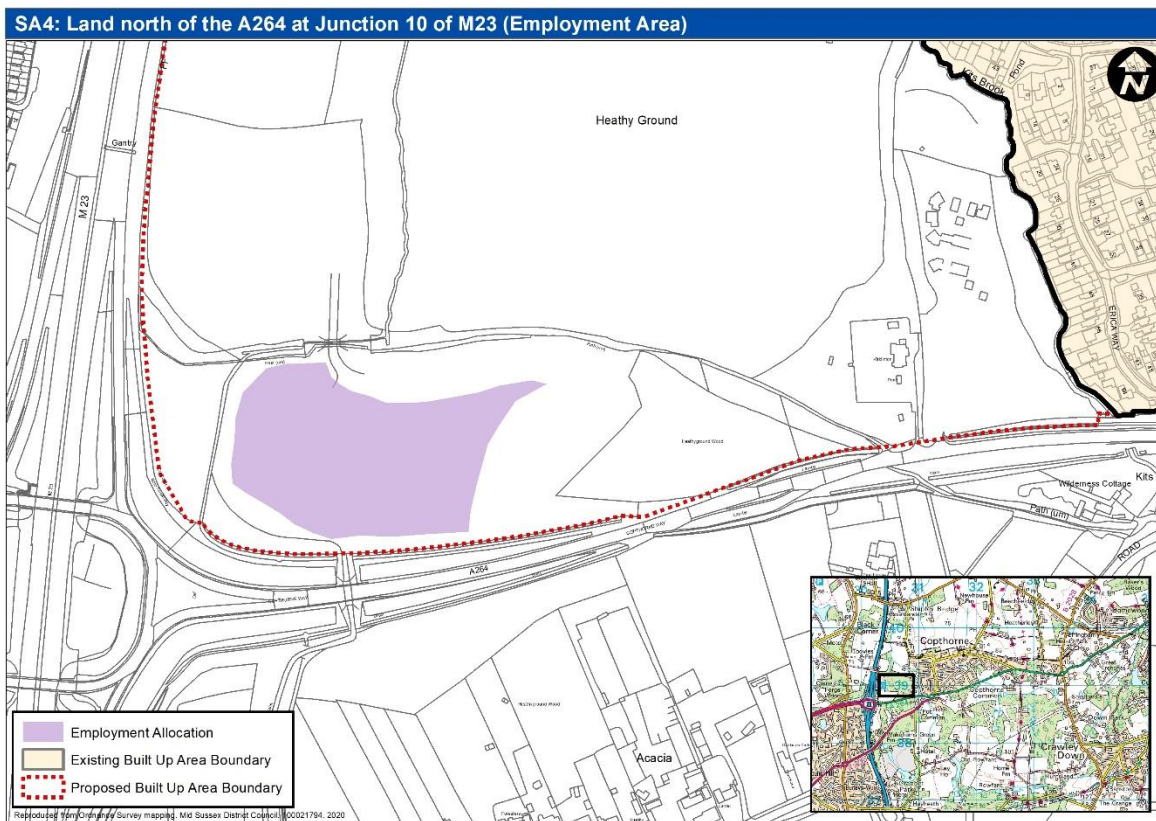
- Proposals must demonstrate that there is a mix of B1/B2 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.

SA4: Land north of the A264 at Junction 10 of M23 (Employment Area)

SHELAA: 940

Parish: Worth

Developable Area (ha): 2.7



Allocation:

Employment land within use classes B1 (Business/Light Industrial) and B8 (Storage and Distribution) are appropriate for this site, and proposals for these uses will be supported.

Proposals must demonstrate that there is a mix of B1/ B8 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.

Site Specific Requirements:

- Proposals must demonstrate that there is a mix of B1/ B8 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- Proposals should ensure there will be no negative impacts on neighbouring residential amenity.
- Proposals that include enabling non-business use classes in addition to business use will only be permitted where it has been clearly demonstrated with substantiated evidence, which may include a sequential test, impact assessment and viability assessment, that proposals for only business uses (B1 and B8) are not economically viable.
- Development must be of high-quality design and layout, in accordance with DP26: Design.
- Provide a comprehensive landscaping scheme for the site in order to create an appropriate setting and landscaped context for the new development. A landscape screen should be included on the southern boundary of the site to ensure it would not be dominant in the landscape.
- Incorporate the permissive footpath/cycle path within the site layout or identify its relocation as part of the detailed design proposal.

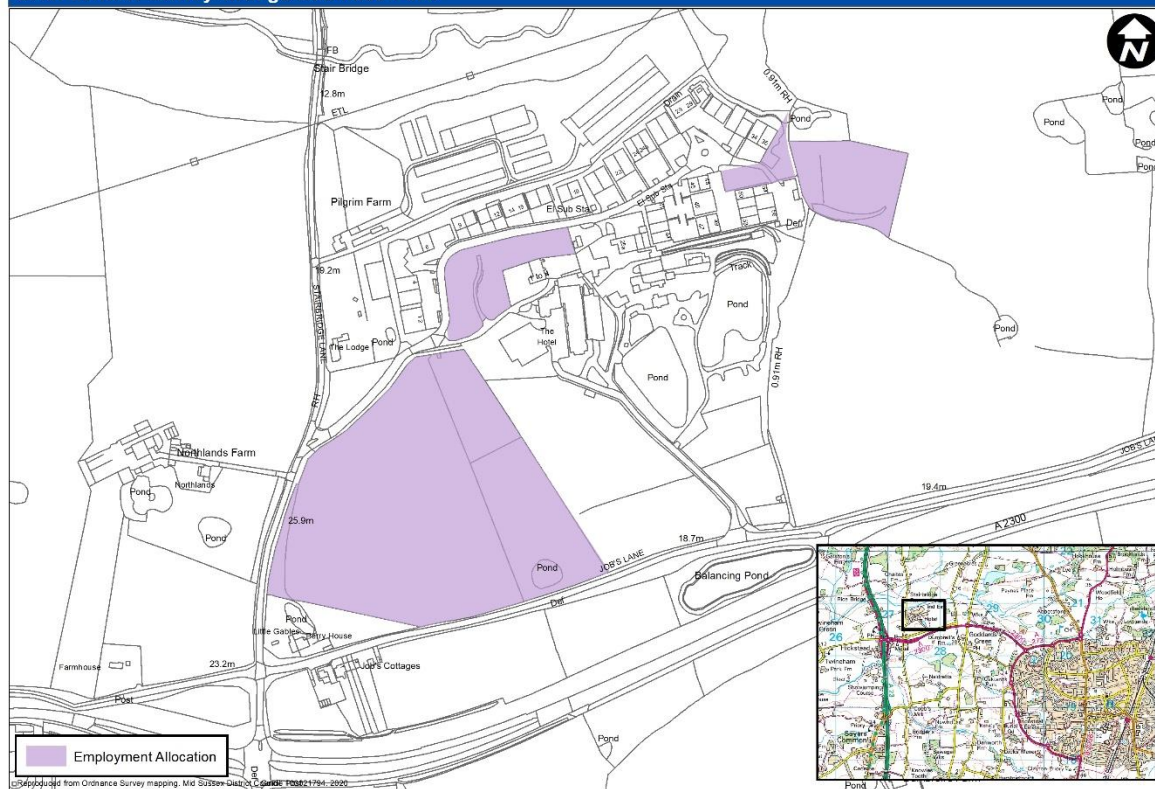
SA5: Land at Bolney Grange Business Park

SHELAA: 24, 906, 907, 931

Parish: Bolney and Hurstpierpoint & Sayers Common

Developable Area (ha): 7

SA5: Land at Bolney Grange Business Park



Allocation:

Employment land within use classes B1 (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) are appropriate for this site, and proposals for these uses will be supported.

Site Specific Requirements:

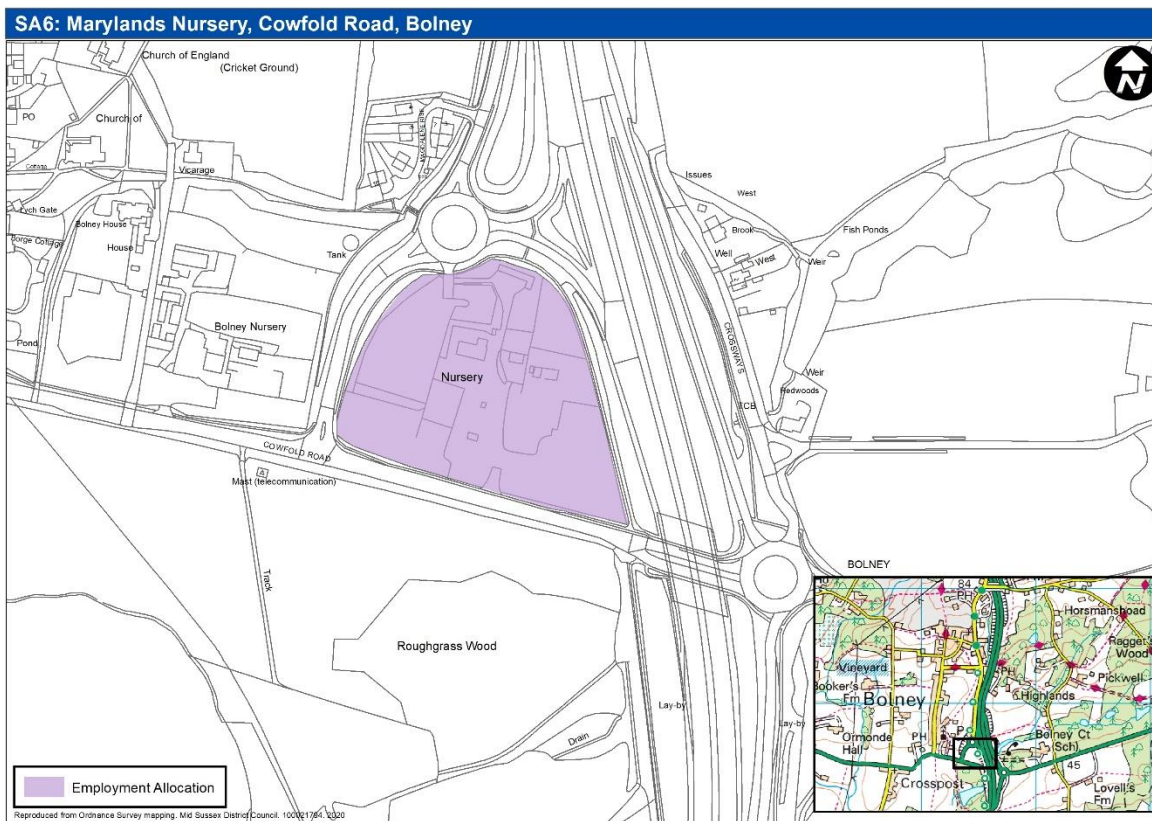
- Proposals must demonstrate that there is a mix of B1/B2/B8 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- Seek improvements to public transport, in particular, sustainable transport links between the site and proposed Science and Technology Park to the east.

SA6: Marylands Nursery, Cowfold Road, Bolney

SHELAA: 864

Parish: Bolney

Developable Area (ha): 2.4



Allocation:

Allocated for B8 (Storage and Distribution) employment uses.

Site Specific Requirements:

- Access should only be achieved using the existing access from the northern roundabout. Proposals should ensure no adverse impact on the junction with Cowfold Road, any adverse impacts must be mitigated.
- Proposals that include enabling non-business use classes in addition to business use will only be permitted where it has been clearly demonstrated with substantiated evidence, which may include a sequential test, impact assessment and viability assessment, that proposals for only business uses (B8) are not economically viable.
- Development must be of high-quality design and layout, in accordance with DP26: Design. Building height should be limited to respect Bolney’s rural character. Provide a comprehensive landscaping scheme for the site in order to create an appropriate setting and landscaped context for the new development.
- A site-specific Flood Risk Assessment will be undertaken to inform the site layout and any appropriate mitigation measures that may be necessary.

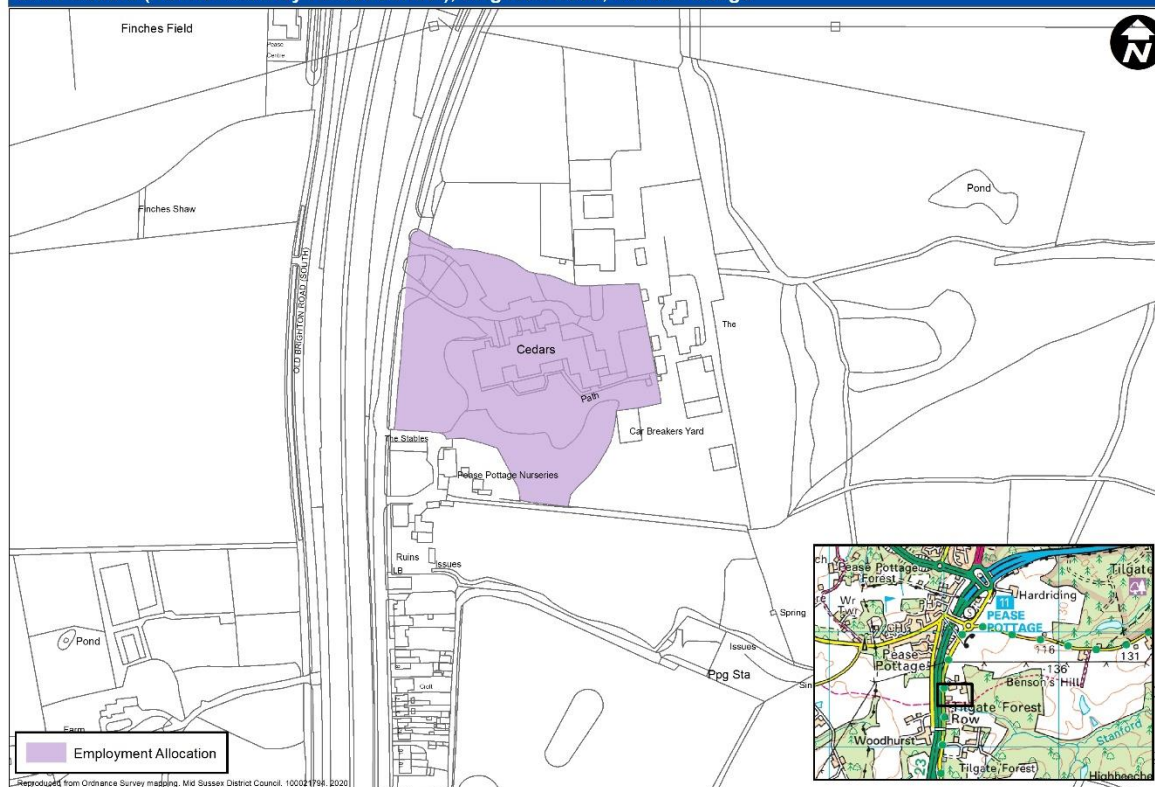
SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage

SHELAA: 888

Parish: Slaugham

Developable Area (ha): 2.3

SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage



Allocation:

Employment land within use classes B1 (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) are appropriate for this site, and proposals for these uses will be supported.

Site Specific Requirements:

- Proposals must demonstrate that there is a mix of B1/B2/B8 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to minimise impact on the AONB.
- Development should retain any mature trees on the site.
- The site is designated as Deciduous Woodland Priority Habitat and Woodpasture and Parkland Priority Habitat. Development should seek opportunities to restore and manage this habitat.
- Proposals that include enabling non-business use classes in addition to business use will only be permitted where it has been clearly demonstrated with substantiated evidence, which may include a sequential test, impact assessment and viability assessment, that proposals for only business uses (B1, B2 and B8) are not economically viable.
- Site is adjacent to a waste management facility, development should not prevent or prejudice the continued use of the waste management facility.

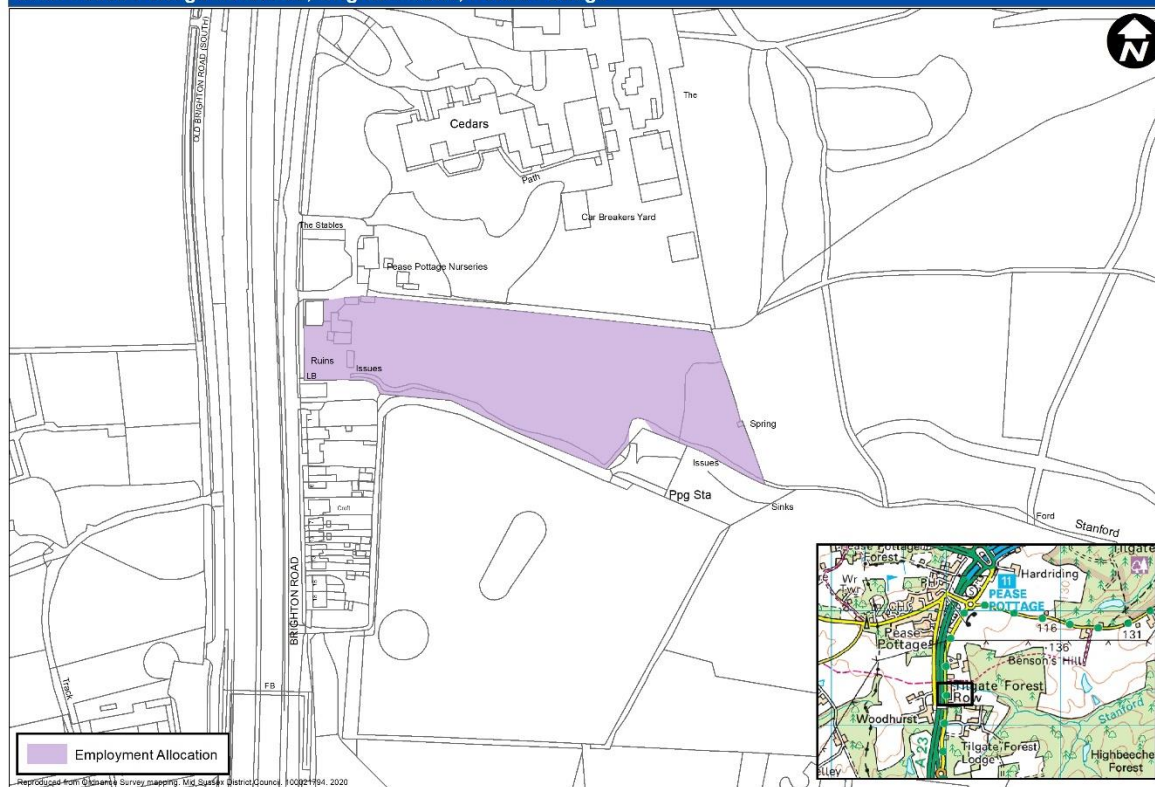
SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage

SHELAA#: 192

Parish: Slaugham

Developable Area (ha): 1

SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage



Allocation:

Employment land within use classes B1 (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) are appropriate for this site, and proposals for these uses will be supported.

Site Specific Requirements:

- Proposals must demonstrate that there is a mix of B1/B2/B8 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to minimise impact on the AONB.
- An area of Ancient Woodland is adjacent on the eastern border. Development should be situated outside a minimum 15m buffer zone of ancient woodland in accordance with DP37: Trees, Woodland and Hedgerows.
- Development should retain any mature trees on the site and its boundaries.
- The site is designated as Deciduous Woodland Priority Habitat. Development should seek opportunities to restore and manage this habitat.
- Proposals should ensure there will be no negative impacts on neighbouring residential amenity, particularly related to noise and air pollution associated with B2 uses.
- Proposals that include enabling non-business use classes in addition to business use will only be permitted where it has been clearly demonstrated with substantiated evidence, which may include a sequential test, impact assessment and viability

assessment, that proposals for only business uses (B1, B2 and B8) are not economically viable.

Science and Technology Park

- 2.11 One of the District Plan's key strategic issues is economic growth. The District Plan seeks to support sustainable communities and a robust local economy by encouraging opportunities for residents to work within their towns and villages. This aim is supported by the Council's Economic Development Strategy 2018-2031. Given the significant planned housing growth at Burgess Hill, it is important to supplement this with sufficient employment land within this location to ensure this aim can be met.
- 2.12 District Plan Policy **DP1: Sustainable Economic Development** identifies a broad location for a Science and Technology Park to the west of Burgess Hill, to support research and development and provide high quality employment for the wider area. The principle of the allocation and location itself was based upon a range of documents which assessed deliverability, market demand, feasibility and suitability.
- 2.13 The Coast to Capital Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) (2014) identified Burgess Hill as a strategic growth location. This was on the basis of the collective Northern Arc strategic development (3,500 homes), The Hub business park (creating approximately 1,000 new jobs) and the potential for the Science and Technology Park to provide 100,000m² of employment floorspace and 2,500 new jobs. The SEP supported the potential for the Science and Technology Park and recognised that it would impact positively on the wider region and beyond, supporting high end economic and business growth across the Coast to Capital and South East Local Economic Partnership areas.
- 2.14 The SEP was refreshed in 2018 (entitled Gatwick 360°) and continues to support proposals such as this through its eight economic priorities, in particular priorities related to the development of business infrastructure, investment in sustainable growth, creating skills for the future and pioneer innovation.
- 2.15 The Chilmark "Science and Technology Park: Potential Locations Assessment" concluded that there is a well-articulated strategic economic case, including significant opportunities for public economic investment support from the Greater Brighton City Deal, the Coast to Capital LEP and through the Gatwick Diamond for a Science and Technology Park in this location. It also concluded that the location benefitted from good strategic links with potential for future improvements to public transport, plus good visibility and prominence for the occupier and end-user market.
- 2.16 District Plan Policy DP1 identified a broad location to the west of Burgess Hill for a Science and Technology Park. Through the Council's SHELAA, two specific sites were promoted within this broad location. Site Selection Paper 4: Employment explains the Council's rationale for selecting the preferred site option for allocation which is set out in Site Allocation Policy SA9: Science and Technology Park.

SA9: Science and Technology Park

Land is allocated north of the A2300, as indicated on the policies map, for a Science and Technology Park.

SHELAA:	949	Settlement:	Burgess Hill
Gross Site Area (ha):	48.75		
SA9: Science and Technology Park			
<p>The map displays the SA9 site allocation in purple, situated north of the A2300 road. A hatched area indicates WSCC Waste Sites. An inset map shows the location of Burgess Hill. A north arrow is present in the top right corner. A legend in the bottom left identifies the symbols for WSCC Waste Sites and Employment Allocation. The map is sourced from Ordnance Survey mapping, Mid Sussex District Council, 100021784, 2020.</p>			
Objectives			
<ul style="list-style-type: none"> Proposals will comprise employment accommodation capable of accommodating a minimum of approximately 2,500 jobs. Proposals must demonstrate that the development would comprise uses falling within the definition of a Science Park: a business support environment that encourages and supports the start-up, incubation and development of innovation-led, high-growth, knowledge-based businesses. This is alongside any appropriate ancillary uses required to serve the development and its employees (for example, but not limited to, a hotel, conference uses, gym, convenience store, crèche). Proposals in Use Class B8: Storage and Distribution will not be supported. 			
Phasing			
<ul style="list-style-type: none"> Development of the Science & Technology Park will progress in accordance with an allocation wide Masterplan and Phasing Strategy which will have been approved by the Local Planning Authority in consultation with the local Highways Authority and Highways England. Provide a detailed Phasing Strategy as part of any planning application, which sets out all transport mitigation required to enable each phase to be delivered, including measures to mitigate impacts on the local and Strategic Road Network. Development will then be brought forward in strict accordance with the approved Phasing Strategy. 			
Urban Design Principles			
<ul style="list-style-type: none"> Development must be of high-quality design and layout, in accordance with DP26: 			

<p>Design.</p> <ul style="list-style-type: none"> • Landmark buildings should be located in prominent locations, to ensure high visibility from the A2300, where possible in accordance with Landscape, Biodiversity and Green Infrastructure Considerations. • Provide and integrate high quality public realms, including public areas containing ancillary uses. • Ensure the design is sensitive to the overhead power lines within the northern part of the site, including area of easement, and explore opportunities for their diversion or placement underground. • Whilst within the same land ownership, the eastern parcel of the site is allocated for waste uses in the West Sussex Waste Local Plan 2014 (Policy W10) (2014). Ensure that the design of the site takes account of this allocation. • Ensure that the design of the site takes account of nearby safeguarded waste uses, including the Goddards Green Waste Water Treatment Works to the east.
<p>Landscape, Biodiversity and Green Infrastructure Considerations</p> <ul style="list-style-type: none"> • Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside to the south and to ensure the proposed development would not be dominant in the landscape. • Retain the existing woodland to the east. • Retain and enhance existing mature trees and landscaping along the boundaries and within the site, incorporating them into the landscape structure and layout of the development.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> • Archaeological pre-determination evaluation and appropriate mitigation may be required.
<p>Sustainability</p> <ul style="list-style-type: none"> • Provision of electric vehicle charging points in accordance with the Council's adopted standards. • Ensure the design would make the development future-ready for improvements in technology and sustainability such as (but not limited to) green technology, artificial intelligence and automation.
<p>Highways and Access</p> <ul style="list-style-type: none"> • Provision of sustainable transport measures and other infrastructure requirements, including measures to mitigate impacts on the local and Strategic Road Network. • The first priority is to mitigate development impacts by maximising sustainable transport interventions. Remaining impacts must be addressed through physical highway mitigation measures in consultation with the local Highways Authority and Highways England. • Demonstrate that the development would not adversely affect the safe and efficient operation of the A23 and the A23/A2300 junction to the satisfaction of the local Highways Authority and Highways England. • Demonstrate that access can be achieved to the satisfaction of the Highways Authority, minimising disruption and delay on the A2300 and surrounding roads. • Provision of new bus routes or diversion of existing routes to connect with key hubs including railway and bus stations and Burgess Hill town centre. • Provision of new pedestrian and cycle links to ensure connectivity with the Northern Arc, The Hub (south of A2300), Burgess Hill and surrounding countryside. • Provision of pedestrian and cycle connectivity with Bolney Grange Business Park. • Provision of car parking and cycle storage in accordance with the Council's adopted standards.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> • The northern boundary of this site is within Flood Zones 2/3 and therefore should not be

developed.

- A site-specific Flood Risk Assessment will be undertaken to inform the site layout and any appropriate mitigation measures that may be necessary.
- Proposals must incorporate Sustainable Drainage Systems (SuDS) as an integral part of the Green Infrastructure and open space proposals to mitigate flood risk and improve biodiversity and water quality.

Minerals

- The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

Housing Site Allocations

- 2.17 The District Plan 2014-2031 sets out the housing requirement for the district for the plan period of 16,390 dwellings. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.¹¹
- 2.18 The District Plan 2014-2031 establishes a ‘stepped’ trajectory for housing delivery with an average of 876 dwellings per annum (dpa) between 2014/15 and 2023/24 and thereafter an average of 1,090 dpa between 2024/25 and 2030/31. The increased trajectory, from 2024/25, is subject to there being no further harm to the integrity of the European Habitats Sites in Ashdown Forest, which is discussed further below.
- 2.19 The stepped approach is used for the purposes of calculating the five-year housing land supply.
- 2.20 On the basis that the housing requirement for Mid Sussex has been established in the District Plan, the Sites DPD is addressing the residual necessary to meet the existing, and agreed, housing requirement for the plan period up to 2031, including the agreed quantum of unmet housing need to be addressed within Mid Sussex up to 2031.
- 2.21 The District Plan Policy **DP5: Planning to Meet Future Housing Need** sets out a commitment for the Council to continue to work under the ‘Duty-to-Cooperate’ with all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Area (HMA), continuing to prioritise the Northern West Sussex HMA, which is established as the primary HMA for Mid Sussex.
- 2.22 DP5 makes it clear that the approach will ensure that consideration for future unmet need will be considered through a robust plan-making process as part of the review of the District Plan which is scheduled to commence in 2020.

Strategy for Delivery of District Plan Housing Requirement

- 2.23 Housing supply in Mid Sussex is made up of a number of sources, which include:
- Strategic allocations set out within the District Plan 2014-2031
 - Additional allocations set out within the Sites DPD
 - Retained Local Plan (2004) allocations
 - Sites allocated in Small Scale Housing Allocations DPD (2008)
 - Sites allocated within neighbourhood plans
 - Sites not yet identified that will come forward through the development management process in accordance with policies set out in the Development Plan taken as a whole, these are often referred to as ‘windfalls’.
- 2.24 The District Plan 2014-2031 allocates four strategic allocations, which made provision for around 5,080 dwellings to be delivered in the plan period up to 2031 (Table 2.2).

¹¹ Mid Sussex District Council. (2018). *Mid Sussex District Plan 2014-2031*. p.30.

Tale 2.2: District Plan 2014 – 2031: Strategic Allocations

Settlement/ Parish	Settlement Type	Site Name	Number of Dwellings
Burgess Hill	Category 1 - Town	North and North West Burgess Hill (Northern Arc)	3,500 ¹²
Burgess Hill		Kings Way	480
Hassocks	Category 2 - Larger Village (Local Service Centre)	North Clayton Mills	500
Pease Pottage (Slaugham)	Category 3 - Medium Sized Village	Pease Pottage	600
Total			5,080*

*The District Plan 2014-2031 allocated 3,500 dwellings. 3,287 dwellings are anticipated to be delivered in the plan period up to 2031.

- 2.25 The District Plan also sets out the Spatial Strategy for Mid Sussex and focuses the majority of housing and employment development at Burgess Hill as it has the greatest potential to deliver sustainable communities and to benefit from the opportunities that new development can deliver than at the district's other two main towns (East Grinstead and Haywards Heath). Two sites are allocated at Burgess Hill, land to the north and north-west of Burgess Hill and at Kingsway.
- 2.26 A smaller scale of strategic development was also allocated at Pease Pottage, and at Hassocks to complement the overall strategy, the remainder of development will be delivered at sustainable locations to be informed by the Settlement Hierarchy (DP 6) to support economic, infrastructure and social needs whilst maintaining the settlement pattern and protecting the quality of the rural and landscape character of the district.
- 2.27 The delivery of the Strategic Allocations set out in the District Plan have progressed well with building under way on the Kingsway site and the Pease Pottage site, and outline planning consent granted for the other schemes. However, there have been some changes in the number of units expected to be delivered within the plan period up to 2031 for strategic development at Burgess Hill with the amended delivery up to 2031 for District Plan allocations anticipated to be 3,287 dwellings.
- 2.28 Windfall sites are those not specifically identified in the development plan. The Council's Windfall allowance is updated to reflect changes in national policy and District Plan Policy DP6 that supports development of up to 9 dwellings that are contiguous to existing Settlement Boundaries and is based on past performance. The allowance is therefore increased from considering development schemes of 1 to 5 dwellings to 1 to 9 dwellings and so is increased from 45 dwellings per year to 84 dwellings per year. This equates to a windfall allowance of 504 dwellings for years six onwards for the rest of the plan period up to 2031.

¹² Whilst the District Plan allocates 3,500 dwellings at North and North West of Burgess Hill there have been changes in the number of units identified to reflect the amended trajectory for strategic development at Burgess Hill expected within the plan period as confirmed by Homes England who are acting as Site Promoter for the development.

- 2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 1,280 dwellings as at 1st April 2020.
- 2.30 The Sites DPD allocates 22 sites to meet the residual necessary to meet the agreed housing requirement for the plan period as reflected in the 'stepped trajectory' and in accordance with the District Plan. This is important to ensure the Council can continue to maintain a five-year housing land supply.
- 2.31 The Site Allocations Policy **SA10: Housing** updates and complements District Plan Policy **DP4: Housing** and provides context for the residual necessary for the Sites DPD to address. The Site Allocations Policy **SA11: Additional Housing Allocations** identifies the sites that are allocated to meet the residual housing requirement addressed by the Sites DPD.
- 2.32 The Habitats Regulations require that the competent authority (Mid Sussex District Council) assesses the effects of land use plans to determine if there will be an adverse effect on the ecological integrity of a European site as a result of the plan's implementation, either on its own or in combination with other plans or projects. The European sites of interest to Mid Sussex District are the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), which are located within neighbouring Wealden District.
- 2.33 A Habitats Regulations Assessment (HRA) has been undertaken to assess the Site Allocations DPD. The main potential impacts of the Site Allocations DPD are recreation impacts primarily relating to risks to the Ashdown Forest SPA and air quality impacts primarily relating to risks to the Ashdown Forest SAC. The HRA considers the existing approach to mitigation for recreation impacts and the options for future mitigation. The HRA considers the air quality modelling results in relation to the wider context of a long-term trajectory of air quality improvements and transport mitigation measures. Using evidence-based justifications, the HRA has concluded, at this stage of plan-making, that the Site Allocations DPD does not present any potential risks to the Ashdown Forest SPA and SAC that are not capable of being mitigated.

SA10: Housing

The strategy for meeting the housing target for Mid Sussex District is set out within the District Plan Policy **DP4: Housing** and includes details of strategic allocations, along with a policy framework for development.

This policy sets out how the Council will address the residual housing need necessary to fully meet the identified housing target for the District within the plan period.

The minimum housing requirement for the Mid Sussex District, including the agreed quantum of unmet housing need to be addressed within the district, is for at least **16,390** dwellings to be delivered in the plan period between 2014 and 2031.

Delivery will be at an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31.

Additional dwellings (for example windfalls) will be delivered through Neighbourhood Plans or through the Development Management Process. The contribution of all sources of housing supply are shown by the following Table (Table 2.3), which updates and supersedes the table set out in District Plan Policy DP4: Housing.

The spatial distribution of the housing requirement is in accordance with Table 2.4, which updates and supersedes the table set out in District Plan Policy DP4.

Table 2.3: District Plan Housing Requirement (updated)

District Plan minimum Requirement	16,390
Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Completions 2017/18	843
Completions 2018/19	661
Completions 2019/20	1003
Total Housing Commitments (including sites with planning permission and allocations in made Neighbourhood Plans)	9,689
Windfall	504
Residual Housing Requirement	1,280

Site Allocations - Housing Supply

Site Allocations DPD – Allocations (SA11)	1,764
Total District Plan period (2014 - 2031) Supply	16,874
Over-supply within the District Plan period 2014 - 2031	+484

SA10: Housing (continued)**Table 2.4: Spatial Distribution of Housing Requirement**

Settlement category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Haywards Heath	10,653	706	1,409
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks Hurstpierpoint Lindfield	3,005	198	105
3 – Medium Sized Village	Albourne Ardingly Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	238
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warninglid	82	5	12
5 – Hamlets	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walsted	N/A *	N/A *	N/A *
Total		16,390**	1,280	1,764

* Assumed windfall growth only

** including windfalls of 450 dwellings as identified in the District Plan (now updated to 504 dwellings)

SA11: Additional Housing Allocations

In addition to the strategic site allocations set out in District Plan Policy **DP4: Housing**, development will be supported at the additional site allocations, through a comprehensive approach involving the community, local planning authority, developer and other stakeholders, where development meets the requirements set out within the Policy Requirements **SA12 to 33, SA GEN :General Principles for Site Allocations** and are in accordance with the Development Plan read as whole. Table 2.5 below shows how the level of housing required through the Site Allocations DPD will be distributed:

Table 2.5: Sites DPD Housing Allocations

Settlement Type	Settlement	Site Name	Policy Reference	Number of Dwellings	
				Site	Category
Category 1 - Town	Burgess Hill	Land South of 96 Folders Lane	SA 12	40	1,409
		Land South of Folders Lane and East of Keymer Road	SA 13	300	
		Land South of Selby Close	SA 14	12	
		Land South of Southway	SA 15	30	
		St.Wilfrid's School	SA 16	200	
		Woodfield House, Isaacs Lane	SA 17	30	
	East Grinstead	Former East Grinstead Police Station	SA 18	22	
		Land South of Crawley Down Road	SA 19	200	
		Land South and West of Imberhorne Upper School	SA 20	550	
Haywards Heath	Land at Rogers Farm, Fox Hill	SA 21	25		
Category 2 – Larger Village (Local Service Centre)	Crawley Down	Land North of Burleigh Lane	SA 22	50	105
	Cuckfield	Land at Hanlye Lane East of Ardingly Road	SA 23	55	
	Hassocks	Land North of Shepherds Walk	SA 24	N/A (130) ^a	
Category 3 – Medium Sized Village	Ardingly	Land West of Selsfield Road	SA 25	70	238
	Ashurst Wood	Land South of Hammerwood Road	SA 26	12	
	Handcross	Land at St. Martin Close (West)	SA 27	30 (65) ^b	
	Horsted Keynes	Land South of The Old Police House	SA 28	25	
		Land South of St. Stephens Church	SA 29	30	
	Sayers Common	Land to the North of Lyndon, Reeds Lane	SA 30	35	
	Scaynes Hill	Land to the rear of Rear of Firlands, Church Road	SA 31	20	
Turners Hill	Withypitts Farm, Selsfield Road	SA 32	16		
Category 4 – Smaller Village	Ansty	Ansty Cross Garage	SA 33	12	12
Total				1,764	1,764

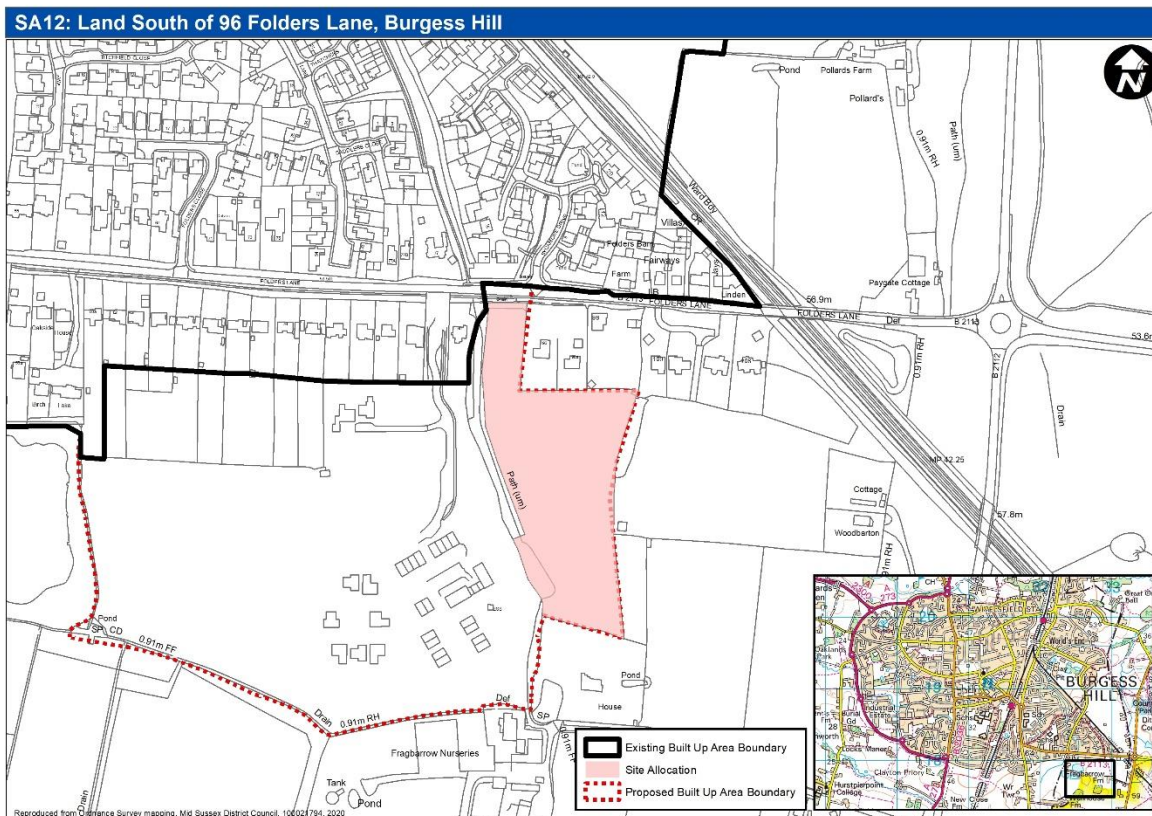
a – Planning permission has been granted on this site and it now as commitment as at 1st April 2020. Therefore, no yield counted here to avoid double counting, although the allocation is to be retained for 130 dwellings.

b – Slaugham Neighbourhood Plan is now made and Land St Martin Close (east) for 35 units is now a commitment as at 1st April 2020. Therefore only 30 units are counted here to avoid double counting.

Individual Housing Allocation Policies

- 2.34 This section contains the site-specific policies for each housing site that is allocated in this Sites DPD. The site-specific policies are set within a template for each site that identifies key objectives and site-specific policy requirements relating to issues such as urban design, landscape, historic environment, highways and access, green infrastructure, biodiversity, social and community and flood risk and drainage.
- 2.35 The site-specific policies are accompanied by a series of general principles which are common to all the sites and are set out in **SA GEN: General Principles for Site Allocations**. Both the site-specific policies and the general principles highlight the issues that should be addressed in detail at the planning application stage. They should be read alongside the National Planning Policy Framework and Planning Practice Guidance and the Development Plan taken as a whole.
- 2.36 In bringing forward the additional housing sites, the Council will expect to see high quality developments, in accordance with the National Planning Policy Framework and District Plan Policy **DP26: Character and Design** that are sustainable in the long term, and that integrate with and contribute to the existing settlement.
- 2.37 The Council has prepared a Mid Sussex Design Guide which is adopted as a Supplementary Planning Document (SPD) and looks specifically at enhancing local distinctiveness, as well as ensuring high quality, sustainable development. The design principles in this SPD will be treated as a material consideration in the assessment of all future planning schemes.
- 2.38 Individual applications for the site allocations should be accompanied by:
- a detailed Design and Access Statement that sets out the vision and overall masterplan for the site, demonstrating a commitment to creating a successful place, with well-designed new homes and supporting infrastructure;
 - a Development Delivery Agreement which shows the proposed programme of house building, and demonstrates the number of homes the development will contribute to the District's five-year housing land supply; and
 - a Statement of Community Involvement that sets out how the Town/Parish Council and other local organisations have been involved in the master planning process and infrastructure requirements.
- 2.39 Community involvement and consultation is key to ensuring that appropriate facilities are identified and designed to meet the needs of those who will use them. Community engagement and involvement is also essential for ensuring that new residents integrate with existing communities.
- 2.40 While the site-specific allocation policies identify some of the key requirements for development at each site, they do not preclude other requirements being identified at a later date. The Infrastructure Delivery Plan (IDP) identifies likely infrastructure requirements and is a live document that should be read in conjunction with the site-specific policies.
- 2.41 West Sussex County Council has responsibility for some of the infrastructure or services identified, such as schools and transport. Detailed requirements for these elements will need to be investigated and agreed with the County Council.

SA 12			
Land South of 96 Folders Lane, Burgess Hill			
SHELAA:	827	Settlement:	Burgess Hill
Gross Site Area (ha):	1.72	Number of Units:	40 dwellings
Description:	Housing allocation		
Ownership:	In control of a house builder		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.		



Objectives

- To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects the setting of the South Downs National Park, providing attractive pedestrian and cycle routes throughout the site so residents can enjoy convenient access existing services and facilities.

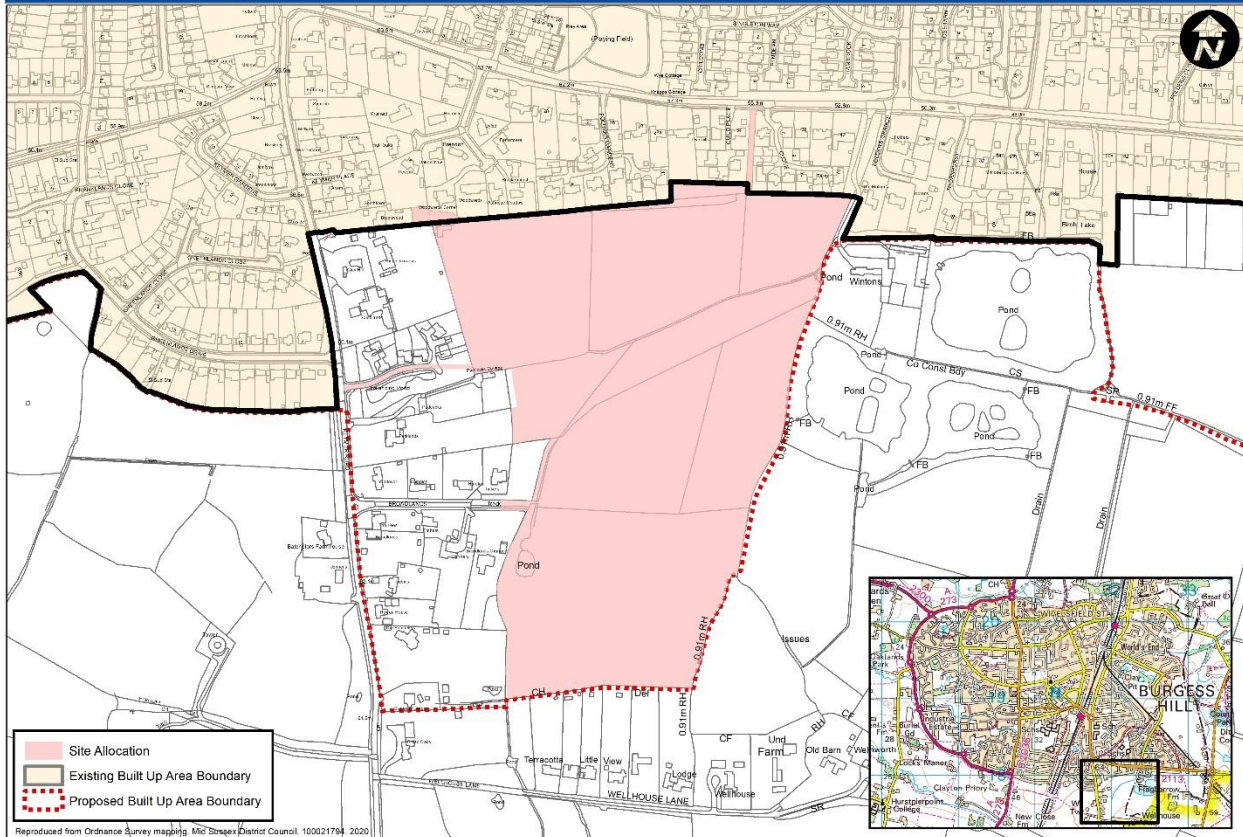
Urban Design Principles

- Orientate development to have a positive edge to the tree lined boundaries and proposed public open space to provide an attractive backdrop and avoid trees overshadowing back gardens.
- Provide an area of open space at the site entrance which integrates the PRow and provides an open space buffer along the tree-lined boundary on the west side.
- Optimise development potential for the site through the layout and design and ensure infrastructure requirements are considered at the concept stage.
- Maximise connectivity with the existing settlement of Burgess Hill and create a permeable layout across the site.
- Make a positive contribution towards the local character and distinctiveness of surrounding development.

<p>Landscape Considerations</p> <ul style="list-style-type: none"> – Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts on the wider countryside and the setting of and any potential views from the South Downs National Park to the south. – Any external lighting scheme shall be designed to minimise light spillage to protect dark night skies. – Retain and substantially enhance existing landscape structure; safeguarding existing trees covered by Tree Preservation Orders along the north boundary of the site and, integrating existing hedge and tree boundaries, with new native tree planting throughout the layout, to contain new housing and limit the impact on the wider landscape. – Protect and enhance the character and amenity of the existing PRoW to the west of the site; including reinforcing the adjacent boundary with native tree planting and species-rich hedgerow, and providing connections through the new development.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Establish the need for pre-determination evaluation and appropriate mitigation. – Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including; retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with connections to the surrounding landscape. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
<p>Highways and Access</p> <ul style="list-style-type: none"> – A Sustainable Transport Strategy will be required identifying sustainable transport infrastructure improvements, demonstrating how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks. – Mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered. – Investigate access arrangements onto Folders Lane and sharing access with the adjacent development to the west; make necessary safety improvements to provide appropriate visibility, pedestrian footways and suitable pedestrian crossing facilities.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Informed by a site specific Flood Risk Assessment (FRA), mitigation measures are required to address flood risk and existing surface water flooding in the northern part of the site adjacent to Folders Lane. Avoid developing areas at risk of surface water flooding. – Surface Water Drainage to be designed to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 13			
Land East of Keymer Road and South of Folders Lane, Burgess Hill			
SHELAA:	976	Settlement:	Burgess Hill
Gross Site Area (ha):	15.2	Number of Units:	300 dwellings
Description:	Housing allocation with on site open space and children's equipped play space.		
Ownership:	In house builders ownership		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.		

SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill



Objectives

- To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects the setting of the South Downs National Park, creating a focal point with a central open space incorporating attractive and convenient pedestrian and cycle routes throughout the site providing good connections to local services and facilities.

Urban Design Principles

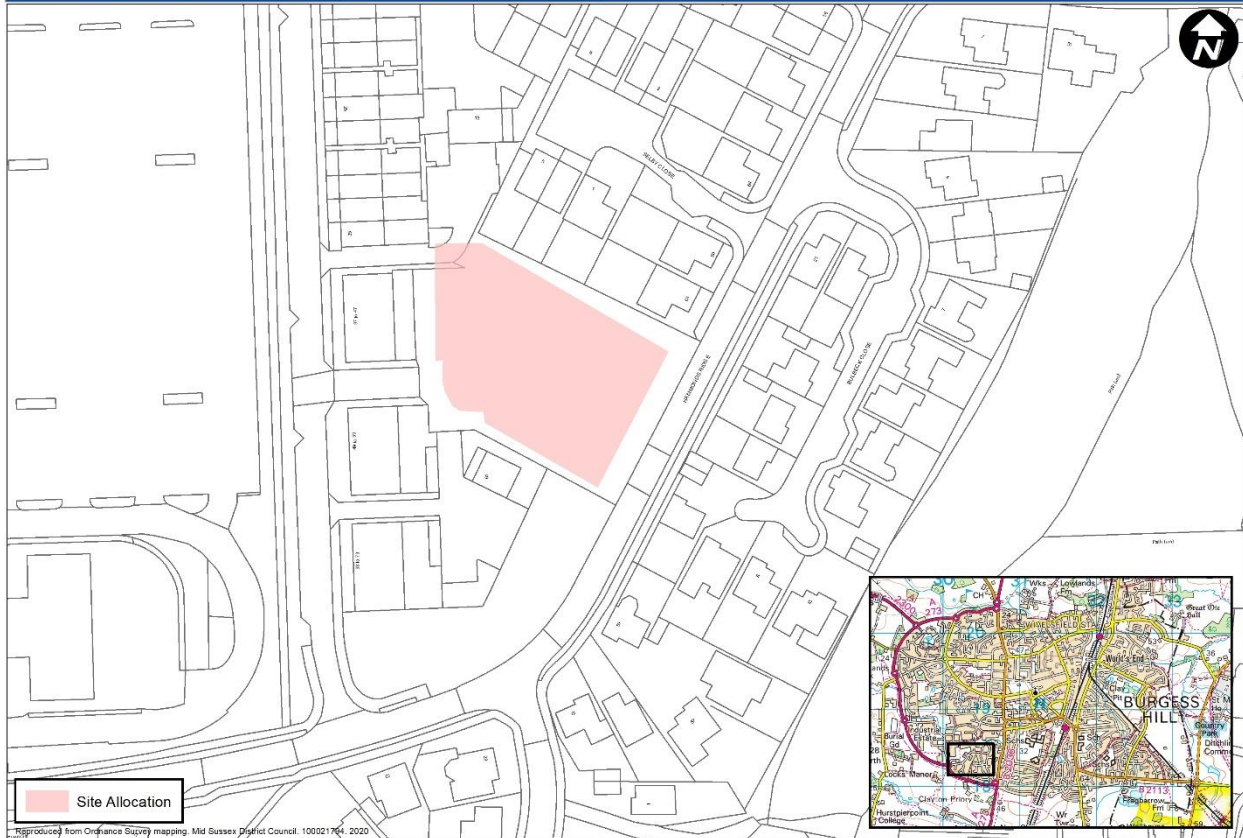
- Comprehensively masterplanned development across the entire site, designing a fully integrated scheme which optimises the potential for the whole site as a single development, under the same planning application(s). Piecemeal development will be resisted.
- Development shall be sympathetic to the transitional, urban edge, semi-urban to semi-rural character of Keymer Road/Folders Lane whilst protecting the landscape setting.
- Existing landscape features and established trees shall be integrated with enhanced green infrastructure, open space provision and movement strategy that encourages pedestrian and cycle use.
- Establish a strong sense of place through the creation of a main central open space to provide a focus for the development with higher density housing in close proximity to benefit from the provision with lower density development towards the southern end of the site to reflect the existing settlement pattern.
- Orientate development to have a positive edge to proposed open space and to the countryside

by fronting onto retained field boundaries/ mature trees.
Landscape Considerations
<ul style="list-style-type: none"> – Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts on the most visible parts of the site on the wider countryside and the setting of and any potential views from the South Downs National Park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect dark night skies. – Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill. – Retain and substantially enhance existing landscape structure, particularly along the southern and eastern boundary. Safeguard mature trees and landscaping along the boundaries, within the site and along historic field boundaries, incorporating them into the landscape structure and layout of the development with new native tree planting throughout the layout, to contain new housing and limit the impact on the wider landscape. – Protect the character and amenity of the existing PRoW to the south of the site.
Social and Community
<ul style="list-style-type: none"> – Provide a suitably managed and designed on site public open space, equipped children’s play space/kickabout area. – Mitigate increased demand for formal sport to the satisfaction of the Local Planning Authority.
Historic Environment and Cultural Heritage
<ul style="list-style-type: none"> – Provide appropriate layout, design and landscaping, particularly within the north west corner of the site, to protect the rural setting of the Grade II Listed High Chimneys, ensuring development is not dominant in views from the building or its setting and by reinforcing the tree belt on the western boundary. – Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including; retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape. – Provide a Habitat Management Plan detailing conservation and enhancement of all areas of Habitat of Principle Importance (HPI) (woodland, hedgerows and standing water); this shall include retention of a minimum of a 5 metre buffer around the HPI. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
Highways and Access
<ul style="list-style-type: none"> – A Sustainable Transport Strategy will be required identifying sustainable transport infrastructure improvements, demonstrating how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks. – Provide vehicular access onto Keymer Road and make any necessary safety improvements; access(es) shall include a pedestrian footway connecting to existing footpaths on the highway. – Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered. – Provide good permeability across the site with attractive and convenient pedestrian and cyclepath access connecting onto Folders Lane and Keymer Road to improve links to existing services in Burgess Hill.
Flood Risk and Drainage
<ul style="list-style-type: none"> – Informed by a Flood Risk Assessment (FRA), measures are required to address flood risk associated with the site and in particular the watercourse which runs across the site and down the western boundary. Avoid developing areas adjacent to the existing watercourse and those at risk of surface water flooding.

<ul style="list-style-type: none">– Surface Water Drainage to be designed to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
Minerals
<ul style="list-style-type: none">– The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.
Utilities
<ul style="list-style-type: none">– Provide necessary water infrastructure reinforcement on Keymer Road.– Occupation of development will be phased to align with the delivery of necessary sewerage infrastructure, in liaison with the service provider.

SA 14			
Land to the south of Selby Close, Hammonds Ridge, Burgess Hill			
SHELAA:	904	Settlement:	Burgess Hill
Gross Site Area (ha):	0.16	Number of Units:	12 flats plus community use
Description:	Mixed use allocation of housing and community facilities		
Ownership:	MSDC		
Current Use:	Brownfield site/former site office	Indicative Phasing:	6 to 10
Delivery Mechanisms:	District Council in partnership with Developer/ Registered Provider		

SA14: Land to the south of Selby Close, Hammonds Ridge, Burgess Hill



Objectives

- To deliver a high density, sustainable, mixed use development which is comprehensively integrated with, and connected to, the surrounding development and Town Centre so residents can access existing facilities.

Urban Design Principles

- The site is in a sustainable location near to services and Burgess Hill Town Centre. Optimise the development potential of the site while respecting the character of the surrounding townscape and residential amenity.
- Seek to enhance the connectivity of the site with the surrounding development by providing pedestrian and/or cycle links to existing networks.
- Orientate development to provide a positive frontage to Hammonds Ridge and the small open space and trees to the south.
- Ensure building heights are in keeping with the surrounding area, so as not to cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution.

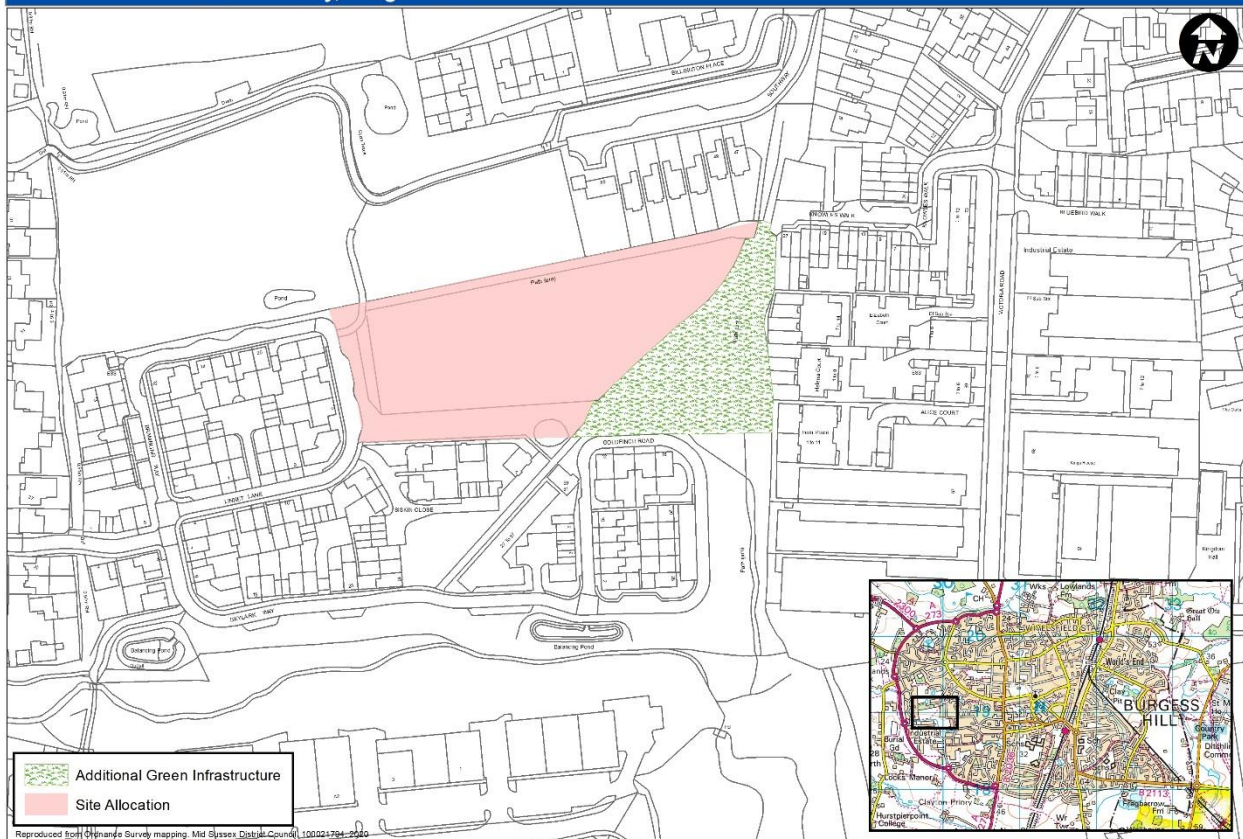
Landscape Considerations

- The south western corner of the site contains a number of trees covered by a group Tree Preservation Order. Retain and enhance existing mature trees and incorporate these into the landscaping proposals for the site.

Social and Community
– Include a community use as part of the development proposals as required by a restrictive covenant relating to this site.
Biodiversity and Green Infrastructure
– Provide a net gain in biodiversity and Green Infrastructure through ecological enhancements, by incorporating new natural native habitats and native street trees into the landscaping proposals and designing buildings with integral bat boxes and bird nesting opportunities.
Highways and Access
– Provide access from Hammonds Ridge or through the CALA Homes development at Edwin Street to the west, the details of which will need to be investigated further.
– Provide a Sustainable Transport Strategy to identify sustainable transport infrastructure improvements and demonstrate how the development will provide comprehensive sustainable links to the town centre and transport hubs, including safe and convenient routes for walking and cycling.
Flood Risk and Drainage
– Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
Minerals
– The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 15			
Land South of Southway, Burgess Hill			
SHELAA:	594	Settlement:	Burgess Hill
Gross Site Area (ha):	1.2	Number of Units:	30 dwellings
Description:	Housing and open space allocations		
Ownership:	Private landowner		
Current Use:	Overgrown and inaccessible land designated as part of a wider area of Local Green Space in the Burgess Hill Neighbourhood Plan	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with developer		

SA15: Land South of Southway, Burgess Hill



Objectives

- This policy seeks to deliver a high quality, sustainable residential scheme along with a number of public benefits in the form of enhanced and accessible open space, that is connected to the surrounding network of adjacent open spaces; improvements to the amenity of and setting to the right of way that crosses the site and the informal paths that border the site and the provision of a cycle route to connect to adjacent cycle routes as part of the Burgess Hill Place and Connectivity Programme.

Urban Design Principles

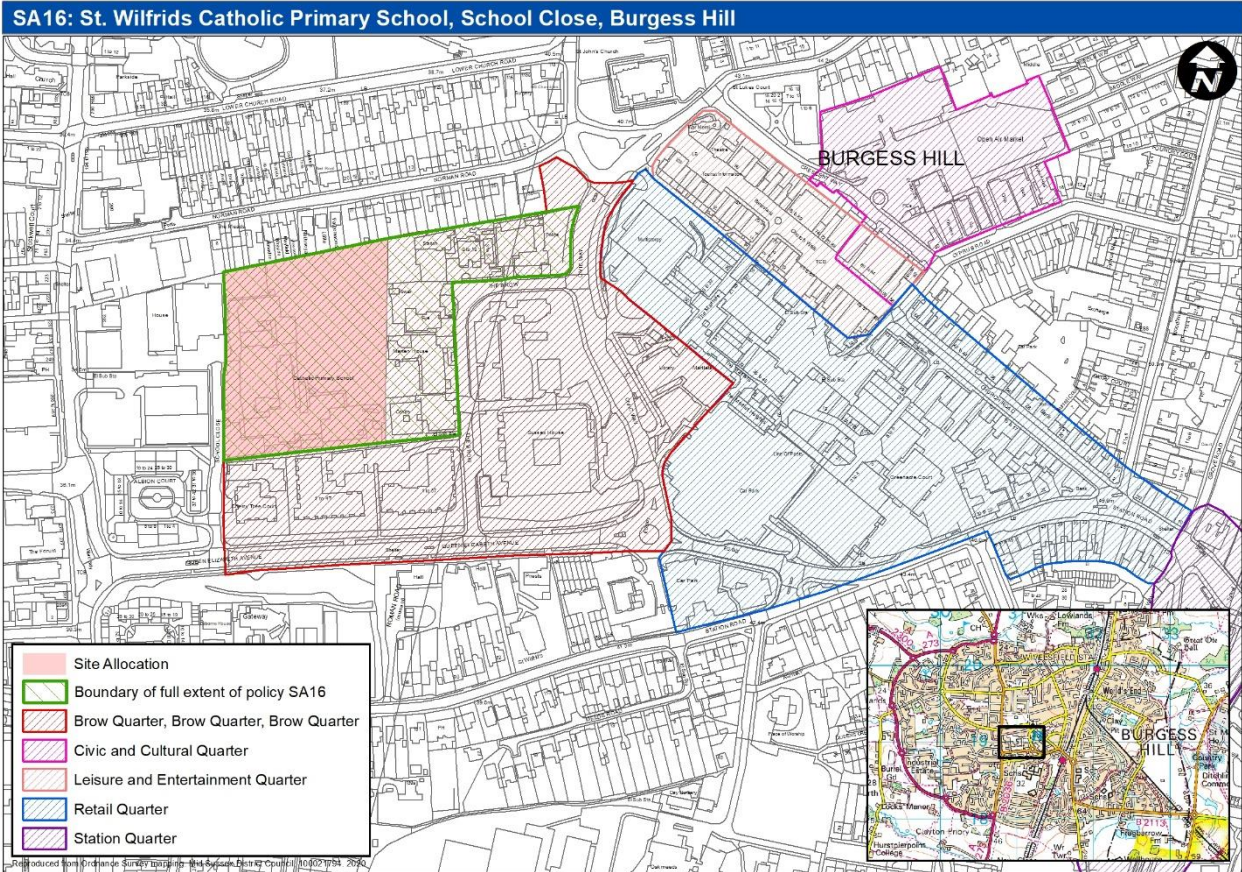
- The site is in a sustainable location near to local services. Optimise the development potential of the site while making provision for open space and rights of way, as well as respecting the character of the surrounding townscape.
- Orientate development to have a positive active frontage to the woodland to the north and existing Maltings Park development (south and west) to provide an attractive backdrop to the public realm, integrate with the existing settlement and avoid trees overshadowing back gardens.

Landscape Considerations

- Retain any important mature trees and safeguard existing trees covered by Tree Preservation

<p>Orders, and incorporate these into the landscape structure of the development.</p> <ul style="list-style-type: none"> – The layout of the development is to be informed by a landscape led masterplan.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Compensate for the loss of Local Green Space (the southern most part of a larger area of Local Green Space allocated in the Burgess Hill Neighbourhood Plan) through the provision of new enhanced open space on site, that creates a connected network of open spaces and green corridors with the adjacent Local Green Space, and which sensitively integrates the right of way and informal paths and enhances their amenity. – Upgrade the existing right of way that crosses the site to allow for cycling.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – The site may contain buried archaeology. Carry out Archaeological Assessment and appropriate mitigation arising from the results.
<p>Air Quality / Noise</p>
<ul style="list-style-type: none"> – Industrial units are located to the east of the site which may be a source of noise. Provide appropriate mitigation to address any impacts.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Provide access from Linnet Lane. The loss of the two visitor parking spaces to achieve this would need to be compensated for within the development. Detailed access arrangements will need to be investigated further. – Provide a Sustainable Transport Strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
<p>Contaminated Land</p>
<ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.
<p>Minerals</p>
<ul style="list-style-type: none"> – The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 16			
St. Wilfrids Catholic Primary School, School Close, Burgess Hill			
SHELAA:	345	Settlement:	Burgess Hill
Gross Site Area (ha):	1.60	Number of Units:	200 dwellings
Description:	Mixed use allocation of residential and community facilities		
Ownership:	Public bodies and private landowners		
Current Use:	School	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Landowners to bring the development forward		



Objectives

- To achieve comprehensive redevelopment which encompasses the broad aspirations and objectives of Burgess Hill Neighbourhood Plan Policy BHNP – TC3 The Brow Quarter. Optimise the town centre location by delivering a high density, sustainable, mixed use development of residential and community facilities, with each element of the scheme designed as an integrated part of a comprehensive design that delivers a legible layout with improved connectivity with the town centre and wider area. A masterplanned approach to the design shall be informed by preparation of The Brow Development Brief Supplementary Planning Document (SPD) for the site and the adjacent land parcels at The Brow.

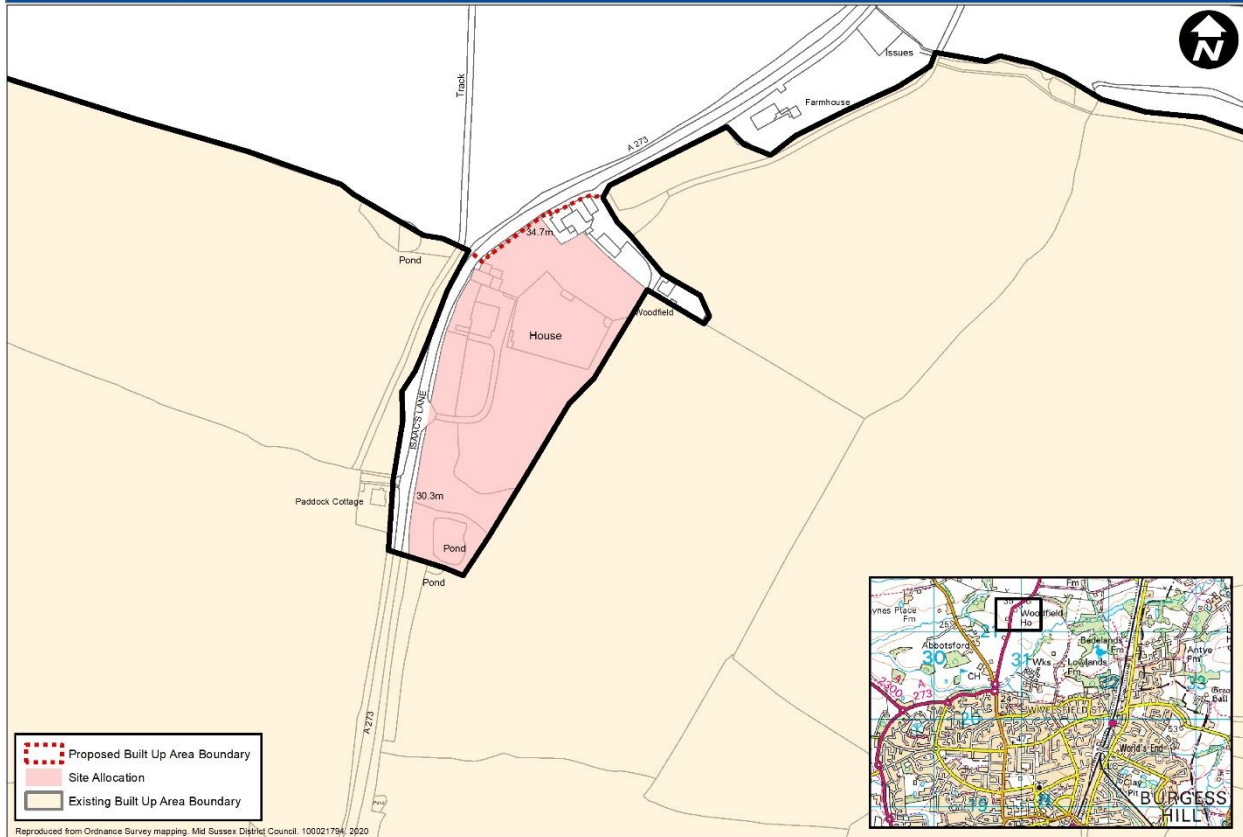
Urban Design Principles

- Comprehensively masterplan development across the entire site, designing a fully integrated scheme which optimises the potential for the whole site as a single development, under the same planning application(s). Piecemeal development will be resisted.
- Provide a coherent masterplan for the whole site involving integrated design, establishing a strong sense of place, focused around a high quality area of open space and carefully landscaped public realm, providing an appropriate setting for the scale of development, in accordance with The Brow Development Brief (SPD).
- Optimise the development potential of the site by providing high density development, up to 6 storeys in height designed as perimeter blocks that clearly defines public and private realms while also delivering a legible/permeable layout and active frontages.

<ul style="list-style-type: none"> – Deliver high quality public realm which maximises connectivity through the site, minimising the impact of parking and vehicle movement, providing attractive, convenient and safe pedestrian and cycle routes across the site, with links to existing networks outside the site. – Parking should be discreetly accommodated and mostly provided off-street. – Development shall respond appropriately to adjacent existing development in order to safeguard neighbouring amenity; particularly to the north of the site where a lower scale will be required to avoid overwhelming the rear gardens and domestic-scaled houses on Norman Road. – Layout and design shall take account of potential development opportunities that exist immediately beyond the site boundaries to ensure future redevelopment opportunities are not hindered.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Across the broader development area, which includes BHNP – TC3 The Brow Quarter, the existing uses include the following community uses; a General Practice (GP) Surgery/Clinic, Fire and Rescue Service Fire Station, Ambulance Station and Police Headquarters and St Wilfrid’s Roman Catholic Primary School and playing fields. – Redevelopment proposals shall provide evidence that demonstrates how replacement community facilities will be provided to the satisfaction of the Council and relevant key stakeholders, in accordance with the requirements of District Plan Policy DP25 (Community Facilities and Local Services); evidence shall include re-provision of the school playing fields or justification of their loss to the satisfaction of the Council and Sport England.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – Protect important views from within the site of the Grade II* Listed St John's Church to the north east, through careful design and layout.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Provide a net gain in biodiversity, taking account of the wider ecological context, through biodiversity enhancements and Green Infrastructure provision, incorporating appropriate integral habitat in the construction of the buildings and inclusion of well designed and diverse landscaped areas with native street trees and planting.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Investigate access arrangements onto the Brow, including any necessary improvements to the highway infrastructure. – Provide a Sustainable Transport Strategy to identify sustainable transport infrastructure improvements and demonstrate how the development will integrate with the existing network, providing comprehensive sustainable links to the town centre and transport hubs, including safe and convenient routes for walking and cycling. – Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – Design surface water drainage to minimise run off, incorporate SuDS and to ensure that Flood Risk is not increased.
<p>Contaminated Land</p>
<ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.
<p>Utilities</p>
<ul style="list-style-type: none"> – Southern Water’s Infrastructure crosses the site therefore Easements may be required. Plan the layout to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 17			
Woodfield House, Isaac's Lane, Burgess Hill			
SHELAA:	840	Settlement:	Burgess Hill
Gross Site Area (ha):	1.4	Number of Units:	30 dwellings
Description:	Housing allocation		
Ownership:	Private landowner		
Current Use:	Private dwelling house and garden	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with developer		

SA17: Woodfield House, Isaacs Lane, Burgess Hill



Objectives

- To deliver a high quality, landscape led, sustainable extension to Burgess Hill, that is integrated with the Northern Arc Strategic Development, enabling residents to access facilities.

Urban Design Principles

- The Northern Arc Strategic Development surrounds the site. Connect and integrate the development of this site with the Northern Arc through careful masterplanning involving cohesive design, landscaping, open space and access arrangements that also includes cycle and walking routes.
- Orientate development to have a positive active frontage to the landscape features on the site and in relation to the Northern Arc Strategic Development.

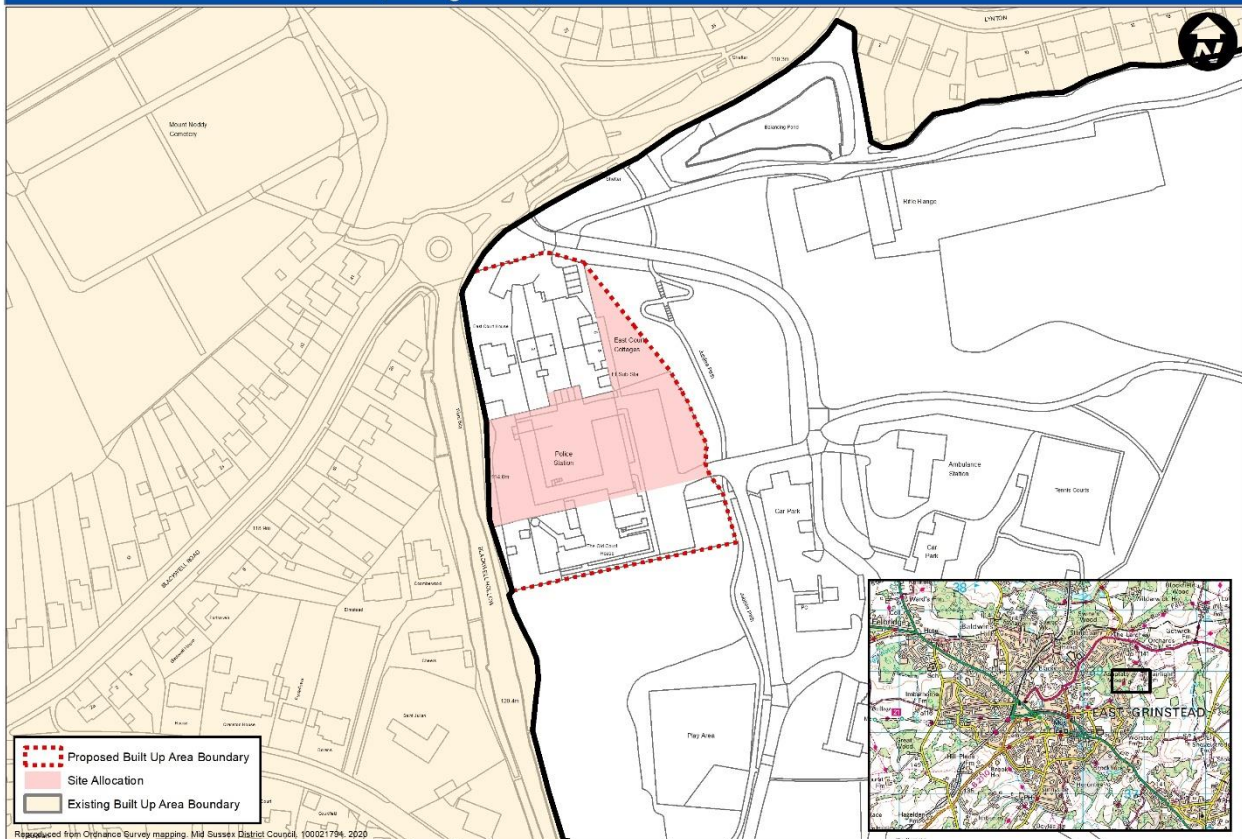
Landscape Considerations

- There is a group Tree Preservation Order in the southern and western areas of the site. High quality substantial new planting of native trees is required, should these be lost to provide access from Isaac's Lane. All other TPO trees on the site are to be retained.
- Retain and enhance important landscape features, mature trees, hedgerows and the pond at the south of the site and incorporate these into the landscape structure and Green Infrastructure proposals for the development. Open space is to be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.
- Identify and protect important views into and out of the site with proposals laid out so that views

are retained and, where possible enhanced to improve both legibility and the setting of development.
Historic Environment and Cultural Heritage
– The site may contain buried archaeology. Carry out Archaeological Assessment and appropriate mitigation arising from the results.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area. – Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure provision to improve biodiversity and water quality.
Highways and Access
– Integrated access with the Northern Arc Development is strongly preferred, the details of which will need to be investigated further.
Flood Risk and Drainage
<ul style="list-style-type: none"> – Provide a site specific Flood Risk Assessment (FRA) to consider how surface water will be disposed from the site. – Incorporate Sustainable Drainage Systems as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
Minerals
– The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 18			
Former East Grinstead Police Station, College Lane, East Grinstead			
SHELAA:	847	Settlement:	East Grinstead
Gross Site Area (ha):	0.42	Number of Units:	22 dwellings
Description:	Housing allocation		
Ownership:	Owned by Police		
Current Use:	Vacant Police Station	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has expressed an interest in bringing the site forward for development		

SA18: East Grinstead Police Station, College Lane, East Grinstead



Objectives

- To deliver a high density development and comprehensive landscape scheme which respects the parkland setting of East Court and protects the setting of nearby heritage assets.

Urban Design Principles

- Optimise the development potential of the site through the provision of apartments of no more than 2 ½ storeys taking account of potential development opportunities that exist immediately beyond the site boundaries to ensure future redevelopment opportunities are not hindered.
- Provide well integrated parking solutions to ensure parking areas do not dominate the public realm.
- Informed by a slope/land stability risk assessment report, provide an appropriate layout and scale of development and ensure any necessary mitigation is undertaken to the rear of the site adjacent to Blackwell Hollow.

Landscape Considerations

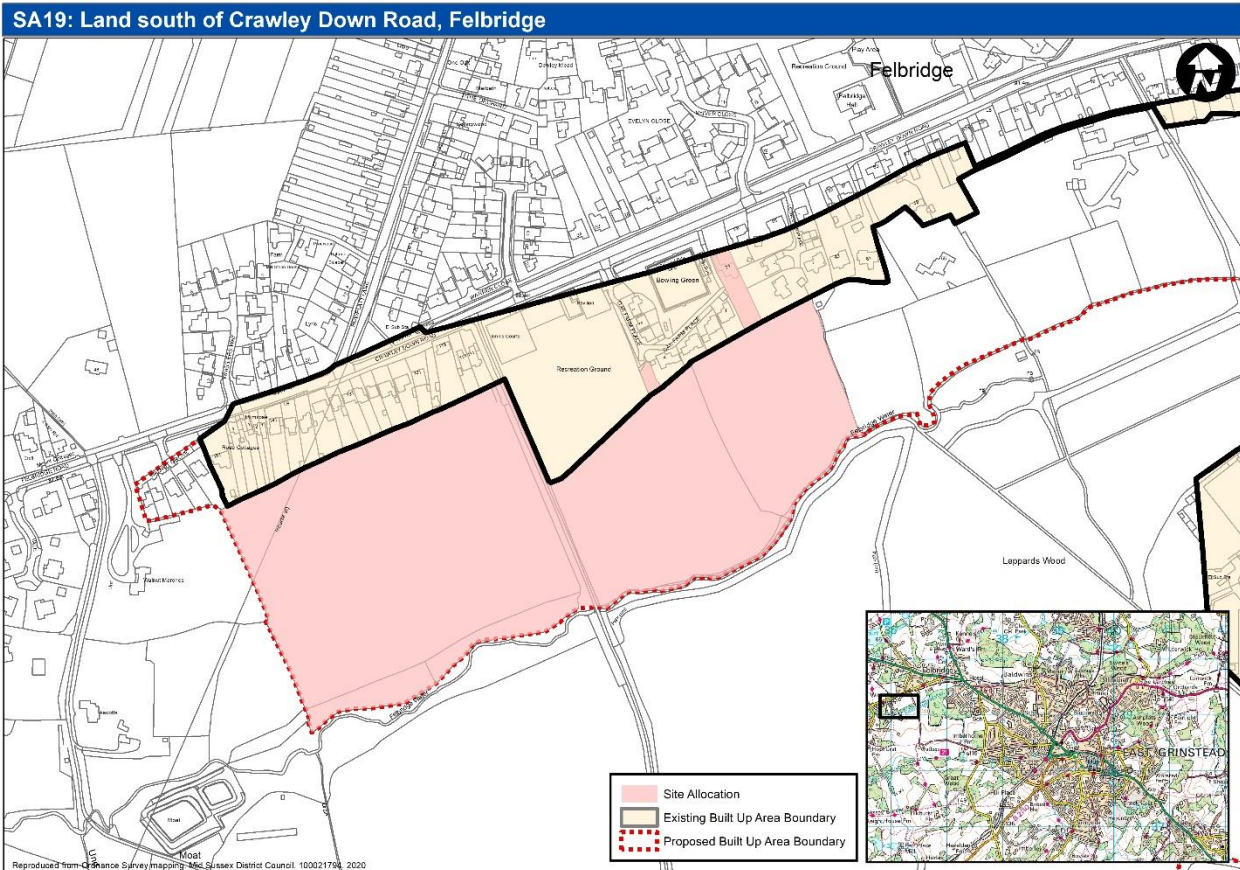
- The design shall respect the parkland setting, providing a comprehensive landscaping scheme that maintains the open frontage of the site, avoiding the use of prominent hard boundary treatment.

Historic Environment and Cultural Heritage

- Informed by a Heritage Impact Assessment, provide an appropriate design, layout and scale of development and landscaping scheme to protect the setting of the nearby Estcots and East

Court Conservation Area and the Grade II Listed Council Offices.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> – Provide a net gain in biodiversity and Green Infrastructure, taking account of the wider ecological context, creating additional habitat in the construction of the building, including where appropriate integral bat and bird boxes, and inclusion of well designed and diverse landscaped areas with native species. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
Highways and Access
<ul style="list-style-type: none"> – Utilise existing access arrangements and make any necessary safety improvements. – Informed by a Transport Assessment, provide an appropriate level of well-integrated car parking.
Flood Risk and Drainage
<ul style="list-style-type: none"> – Surface Water Drainage to be designed to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
Minerals
<ul style="list-style-type: none"> – The site lies within the brick clay (Wadhurst clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.
Utilities
<ul style="list-style-type: none"> – Occupation of the development will be phased to align with delivery of necessary sewerage infrastructure, in liaison with the service provider.

SA 19			
Land south of Crawley Down Road, Felbridge			
SHELAA:	196	Settlement:	East Grinstead
Gross Site Area (ha):	8.5	Number of Units:	200 dwellings
Description:	Housing allocation with onsite playspace and equipped children's playspace.		
Ownership:	Private land owner(s)		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Land in control of site promotor and housebuilder		



Objectives

- To deliver a sympathetic extension to Felbridge, informed by a landscape led masterplan which optimises the opportunities provided by Felbridge Water to include an enhanced landscape buffer and notable biodiversity improvements.

Urban Design Principles

- Optimise the potential of the site through the masterplan process, whilst establishing a strong sense of place which is sympathetic to the landscape setting and character of Felbridge, providing a focus by incorporating a central open space with a higher density of housing in close proximity.
- Ensure the site maximises connectivity with the existing settlement of Felbridge and maintains a permeable layout throughout.
- Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use.
- Development shall be orientated to have a positive edge with the countryside to the south, the PRoW, existing Felbridge recreation ground and proposed public open space, with buildings fronting onto the tree lined field boundaries to provide an attractive backdrop and avoid trees overshadowing back gardens.
- Optimise the potential created by the necessary flood risk buffer to Felbridge Water, including the siting of any necessary flood attenuation ponds to create an attractive edge to the

development and additional recreation area.
Landscape Considerations
<ul style="list-style-type: none"> – Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside to the south. – Retain and substantially enhance existing landscape structure, safeguarding mature trees and landscaping along the boundaries, and within the site and along historic field boundaries incorporating them into the landscape structure and layout of the development to contain the new housing, and limit the impact on the wider landscape; particularly to the southern boundary. – Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill. – Development proposals shall protect the character and amenity of existing PRoW which runs through the centre of the site and provide connections through the new development.
Social and Community
<ul style="list-style-type: none"> – Provide a suitably managed and designed public open space, playspace and equipped children's playspace.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Provision of onsite SuDS will need to contribute to green infrastructure - the flood risk buffer along the Felbridge Water shall be used to maximise potential to enhance ecological connectivity, increase biodiversity and habitat creation. – Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north, should be understood and adequately mitigated. – Provision of good quality green space shall be made for people and wildlife to attract people away from the nearby Hedgecourt Lake SSSI. – Provide necessary protection and mitigation, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package. – Provide enhanced ecological corridors between the ancient woodland and wider landscape to ensure there is no ecological deterioration and fragmentation of the woodland.
Highways and Access
<ul style="list-style-type: none"> – Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing network providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks. – Investigate access arrangements onto Crawley Down Road and make necessary safety improvements to secure appropriate visibility. – The access shall include footpaths to either side to connect with the existing pedestrian network along Crawley Down Road. – Working collaboratively with Surrey and West Sussex County Council Highway Authorities, mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered. – Taking account for sustainable transport interventions, contribute towards providing any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site along the A22/A264 corridor. – Contribute towards improvements and protect the quality of the existing PRoW across the site and provide traffic calming measures where any vehicular access crosses the footpath.
Flood Risk and Drainage
<ul style="list-style-type: none"> – The Southern boundary of the site borders a watercourse (Felbridge Water) and its associated flood zones. Informed by a Flood Risk Assessment, a sequential approach shall be applied to

ensure all development avoids the flood extent for the 1 in 100 year event including Climate Change allowances; hydraulic modelling is likely to be required to identify the full extent of the area.

Contaminated Land

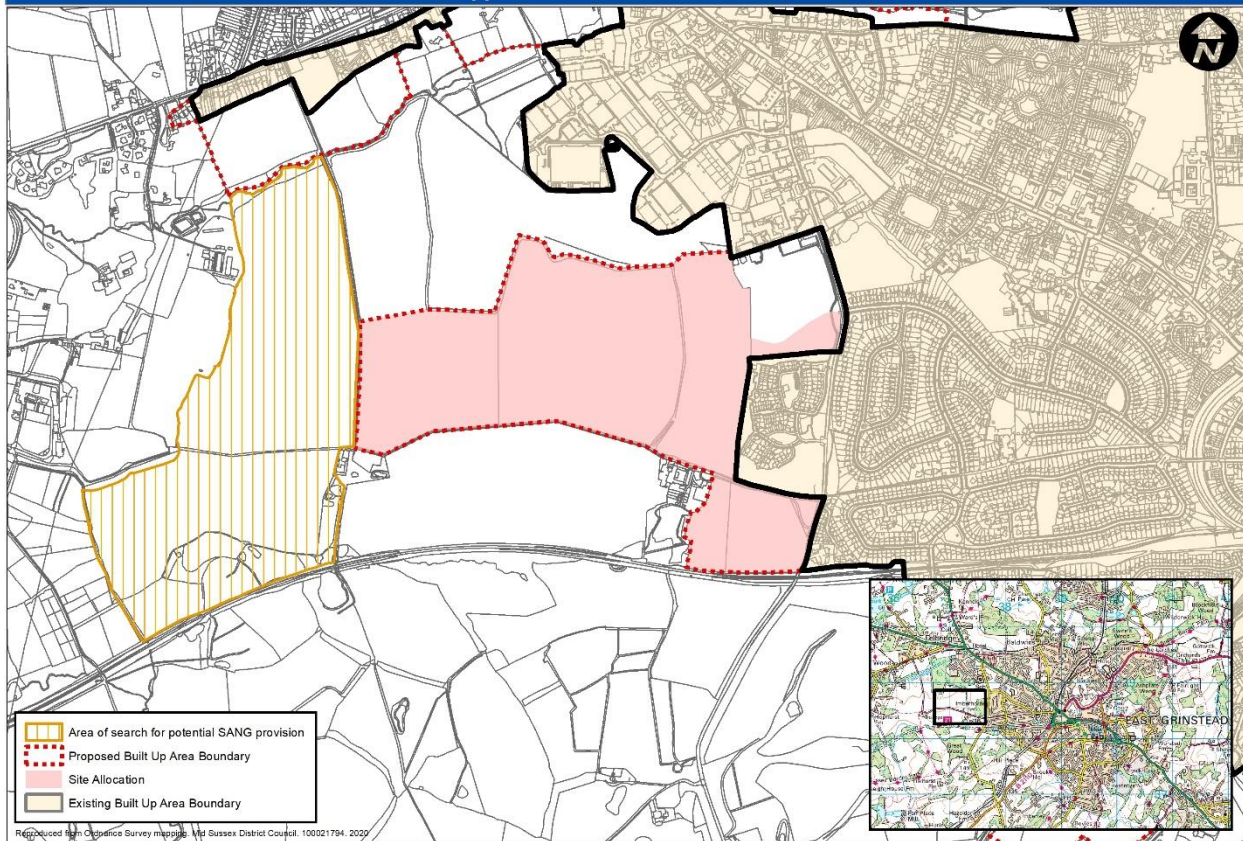
- Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required.

Utilities

- Southern Water’s Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 20			
Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead			
SHELAA:	770	Settlement:	East Grinstead
Gross Site Area (ha):	64.8	Number of Units:	550 dwellings
Description:	Housing allocation with Local Centre and Care Community (C2), early years and primary school (2FE), strategic SANG, public open space and children's equipped playspace, provision of land for playing fields associated with Imberhorne School.		
Ownership:	Private land owner		
Current Use:	Greenfield/arable/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	In control of a land promoter		

SA20: Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead



Objectives

- To deliver a high quality and sustainable extension to East Grinstead, which facilitates the expansion of Imberhorne Upper School, informed by a landscape led masterplan creating a development which is sensitive to the rural setting of the nearby heritage assets, and includes generous green infrastructure corridors to contain the built form. The development shall establish a strong sense of place and include a neighbourhood centre, whilst providing good permeability across the site with attractive pedestrian and cycle routes throughout

Urban Design Principles

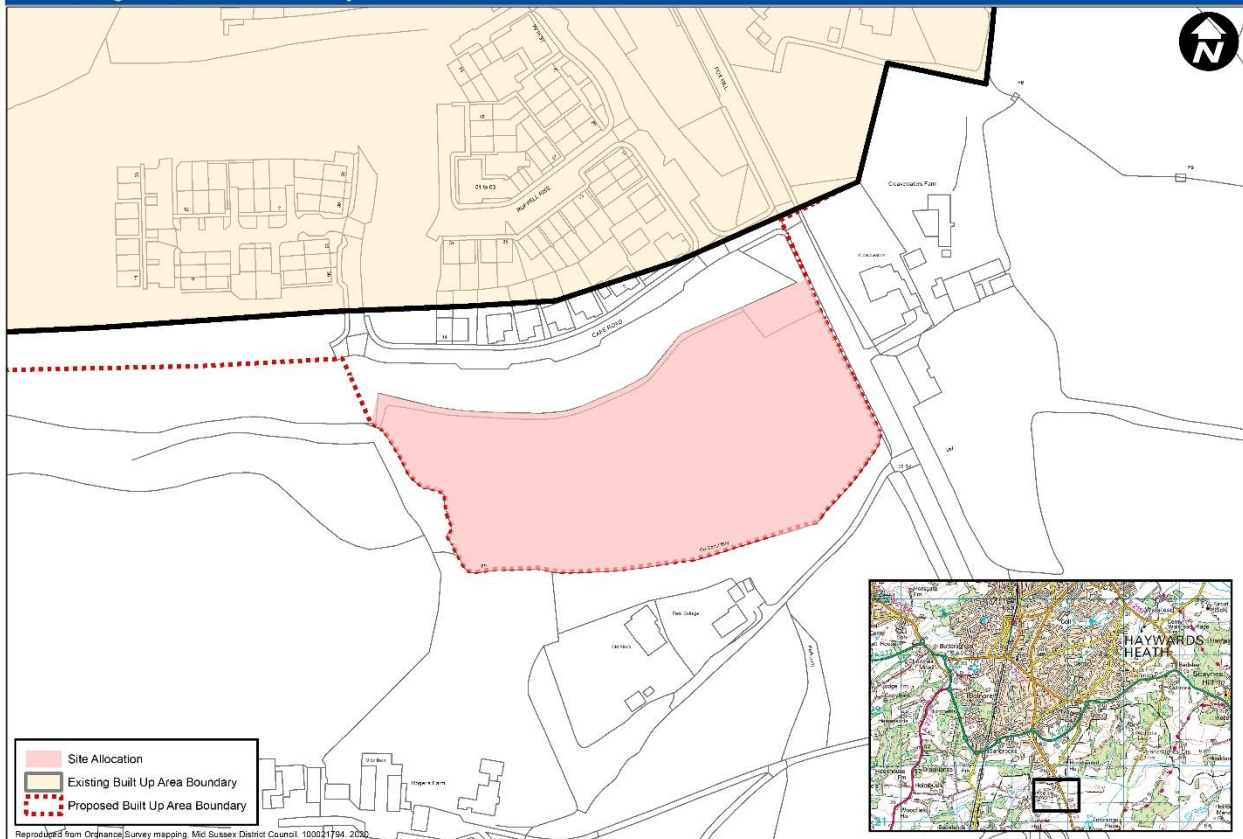
- Optimise the potential of the site through the masterplan process, whilst establishing a strong sense of place which is sympathetic to the existing local character of East Grinstead and the wider landscape setting.
- Development shall provide a pedestrian friendly neighbourhood centre that is centrally positioned and well integrated with the development and in close proximity to the main open space provision.
- Provide a positive and soft edge to Imberhorne Lane and the countryside with buildings that front on to the tree-lined field boundaries allowing an attractive backdrop to the public realm,

<p>avoiding trees overshadowing back gardens.</p> <ul style="list-style-type: none"> – Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use. – Focus higher density development with 3 to 4 storey frontages in the most accessible part of the site around the neighbourhood centre. Carefully accommodate car parking to ensure it does not dominate the public realm. – Ensure the site maximises connectivity with the existing settlement and services within East Grinstead and utilises a permeable layout throughout.
<p>Landscape Considerations</p> <ul style="list-style-type: none"> – Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on the wider countryside. – Retain and substantially enhance existing landscape structure, safeguarding mature trees and landscaping along the boundaries, and within the site and along historic field boundaries incorporating them into the landscape structure and layout of the development to contain the new housing, and limit the impact on the wider landscape. – Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill. – Development proposals will need to protect the character and amenity of the existing PRoW which runs through the site and the Worth Way which runs adjacent to the southern boundary.
<p>Social and Community</p> <ul style="list-style-type: none"> – Provide a detailed phasing plan with agreement from key stakeholders to secure: <ul style="list-style-type: none"> - Land and financial contribution for early years and primary school (2FE) provision with Early Years pre-school and facilities for Special Educational Needs. – 2.2 ha - A land exchange agreement between WSCC and the developer to secure 6 ha (gross) land to create new playing field facilities in association with Imberhorne Secondary School (c.4 ha net - excluding land for provision of a new vehicular access onto Imberhorne Lane). - A community use agreement for the new playing fields/sports facilities at Imberhorne Upper School and for the neighbourhood/local centre to be provided on site. - Provision of suitably designed and managed onsite strategic SANG – c.40 ha - Provision of onsite suitably managed equipped children’s playspace and public open space. In consultation with the Council, mitigate increased demand for formal sport. - Provision of a (C2) Care Community for older people. In consultation with the Clinical Commissioning Group (CCG), address increase demand for GP services either on-site or by financial contribution to support expansion of existing local GP practices. Gypsies and Travellers and Travelling Showpeople provision may be required in accordance with District Plan policies DP30: Housing Mix and DP33: Gypsies and Travellers and Travelling Showpeople.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Protect the rural setting of the nearby Grade II* listed Gullege, Grade II listed Imberhorne Farm and Grade II* listed Imberhorne Cottages by masterplanning the layout, design and landscape structure to ensure the development is not dominant in views from these listed buildings. – Establish need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey, the results of which will identify appropriate archaeological mitigation.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, maintaining existing habitat connectivity, incorporating existing retained trees and hedgerows within the site and connect to surrounding landscape. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality. – Provide necessary protection and mitigation, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package

<p>along with a substantial semi-natural buffer, in excess of the 15m minimum between development and areas of Ancient Woodland.</p> <ul style="list-style-type: none"> – Provide enhanced ecological corridors between the ancient woodland and wider landscape to ensure there is no ecological deterioration and fragmentation of the woodland. – Provide appropriately managed strategic Suitable Alternative Natural Greenspace (SANG) to the satisfaction of the Local Planning Authority to attract people away from the nearby Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). – Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRow to the north and the Worth Way LWS to the south should be understood and adequately mitigated.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing sustainable transport network providing appropriate enhancements to the existing public transport networks and safe and convenient routes for walking and cycling to key destinations and links to the existing networks. – Working collaboratively with Surrey and West Sussex County Council Highway Authorities mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered. – Taking account for sustainable transport interventions, contribute towards providing any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site along the A22/A264 corridor. – Vehicular access and necessary safety improvements will be provided on Imberhorne Lane; the access shall include footpaths to either side to connect with the existing pedestrian network along Imberhorne Lane. – Contribute towards improvements to and positively integrate the PRow which cross the site, including providing an access link into the Worth Way cycle/pedestrian path (Three Bridges – East Grinstead).
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Provide a Flood Risk Assessment to identify the risk of flooding for different areas of the site. A sequential approach to the location of development should be followed and sufficient space retained to allow for the natural flood flow routes that cross the site, taking account of those which come from off site. – Existing watercourses running across the site shall be given a minimum 5 metre buffer from the top of bank and any other existing water features shall be retained and enhanced. – Retain and protect natural spring lines or flows along the southern part of the site adjacent to the Worth Way in order to avoid creating future flood risk. – The masterplan process shall include measures to integrate natural flood risk management techniques and infiltration SuDS into the layout and design of the development.
<p>Contaminated Land</p> <ul style="list-style-type: none"> – Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required; particularly those associated with the historic landfill located around Imberhorne Farm to the south east of the site.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the building stone (Ardingly stone) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.
<p>Utilities</p> <ul style="list-style-type: none"> – Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

SA 21			
Rogers Farm, Fox Hill, Haywards Heath			
SHELAA:	783	Settlement:	Haywards Heath
Gross Site Area (ha):	1.30	Number of Units:	25 dwellings
Description:	Housing and open space allocations		
Ownership:	Private landowner		
Current Use:	Greenfield/grazing	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with Developer		

SA21: Rogers Farm, Fox Hill, Haywards Heath



Objectives

- To deliver a high quality, landscape led, sustainable urban extension to Haywards Heath, which respects the character of this settlement edge and the surrounding countryside, and which is comprehensively integrated with the town so residents can access existing facilities.

Urban Design Principles

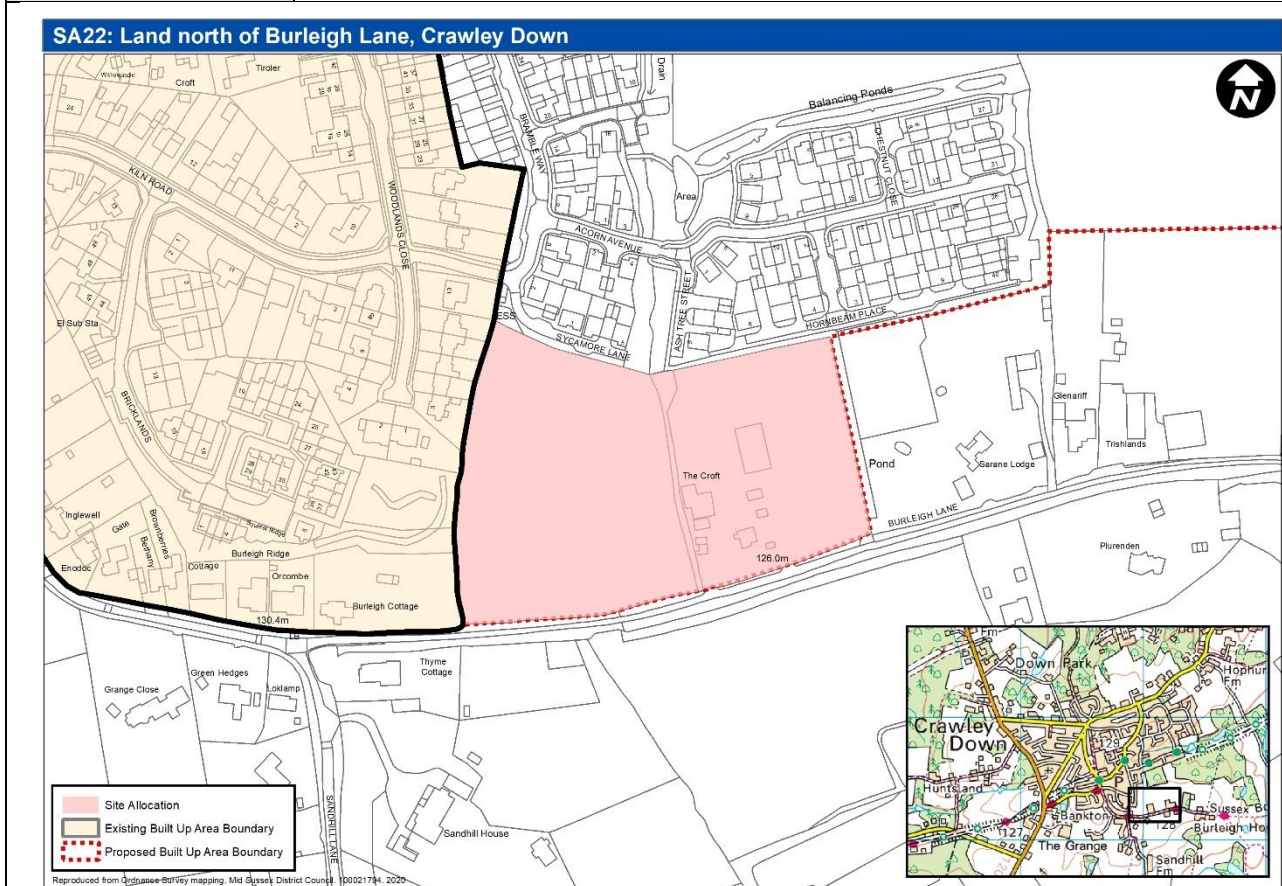
- Optimise the development potential of the site while protecting the sensitive rural edge to the town and the setting of listed buildings through careful masterplanning.
- Seek to enhance the connectivity of the site with Haywards Heath by providing pedestrian and/or cycle links to adjacent existing networks, including a connection to the bridleway to the south of the site.
- Orientate development to have a positive active frontage in relation to the existing settlement, attractive tree boundaries and to define open spaces and routeways.

Landscape Considerations

- Protect the rural character of this edge of settlement and southern approach to Haywards Heath by providing a sufficiently sized landscape buffer along the frontage (eastern) boundary together with a locally native hedgerow and tree screen.
- Retain and enhance mature trees and planting along the northern, western and southern boundaries of the site and incorporate these into the landscape structure and Green Infrastructure proposals for the development to limit impacts on the setting of listed buildings and the wider countryside.

<ul style="list-style-type: none"> – Protect the character and amenity of existing public footpaths that are adjacent to the southern and western boundaries of the site and provide connections to these from the new development.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Create a well connected network of open spaces, suitable for informal recreation on the north and western part of the site. This area is unsuitable for development due to flood risk.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – Preserve the rural setting of the Grade II listed Cleavewater opposite the site through sensitive design and landscaping, including by creating a sufficiently sized landscape buffer along the frontage (eastern) boundary and by providing a locally native hedgerow and tree screen. – Preserve the rural setting of the Grade II listed Rogers Farm and Old Cottage to the south and south west of the site by retaining and enhancing the tree belts along the southern and western boundaries. – The mitigation strategy is to be informed by a Heritage Impact Assessment. – The site may contain buried archaeology. Carry out Archaeological Assessment and appropriate mitigation arising from the results.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss to biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure provision to improve biodiversity and water quality.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Provide access to Lunces Hill (B2112), the details of which will need to be investigated further. – Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – The north western area of the site is at risk of surface water flooding due to the close proximity of watercourses and should not therefore be developed. Provide a Flood Risk Assessment (FRA) to inform the site layout and any necessary mitigation measures that may be required. Any existing surface water flow paths across the site must be maintained. – Incorporate Sustainable Drainage Systems as an integral part of the Green Infrastructure and open space proposals to improve biodiversity and water quality.

SA 22			
Land north of Burleigh Lane, Crawley Down			
SHELAA:	519	Settlement:	Crawley Down
Gross Site Area (ha):	2.25	Number of Units:	50 dwellings
Description:	Housing allocation		
Ownership:	Private landowner		
Current Use:	Former commercial site now overgrown and unused	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with developer		



Objectives

- To deliver a high quality, landscape led, sustainable extension to Crawley Down, which respects the character of the village and the surrounding countryside, and which is comprehensively integrated with the settlement so residents can access existing facilities.

Urban Design Principles

- Concentrate higher density development towards the northern part of the site to reflect the existing settlement pattern, with a lower density towards the southern edges to help create a successful transition with Burleigh Lane.
- Orientate development to have a positive active frontage in relation to the existing settlement, attractive tree boundaries and to define open spaces and routeways.
- Seek to enhance the connectivity of the site with Crawley Down village by providing pedestrian and/or cycle links to Sycamore Lane, Burleigh Way and adjacent existing networks.

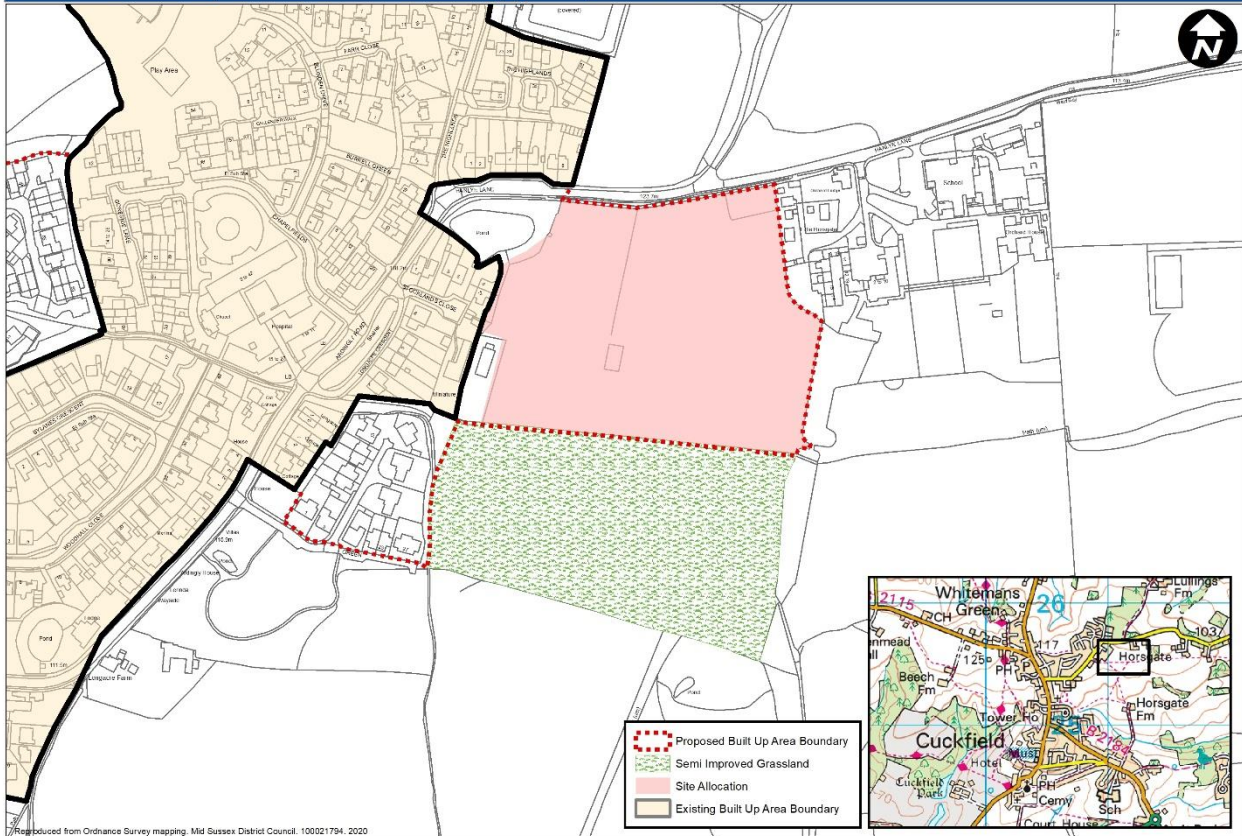
Landscape Considerations

- Retain and enhance existing mature trees and hedgerows on the site and around the boundaries and incorporate these into the landscaping structure for the site to limit impacts on the countryside. Open space should be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.
- Protect the rural character of Burleigh Lane and views from the south by minimising loss of trees and hedgerows along the southern boundary and reinforcing any gaps with locally native

<p>planting.</p> <ul style="list-style-type: none"> – Protect the character and amenity of existing public footpaths and seek to integrate these into the Green Infrastructure proposals for the site.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Provide a Locally Equipped Accessible Play Space (LEAP) that is inclusive to the local community.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – Provide appropriate mitigation to protect the rural setting of the Grade II listed Burleigh Cottage adjacent to the west of the site by creating a sufficiently sized landscape buffer of open space between the listed building and the new development. Provide a hedgerow/ tree belt screening between the open space and the development to protect the rural setting of Burleigh Cottage. The mitigation strategy should be informed by a Heritage Impact Assessment. – Protect the rural character of Burleigh Lane and the setting of Burleigh Cottage by retaining the stone gateways on Burleigh Lane along the southern boundary of the site.
<p>Air Quality / Noise</p>
<ul style="list-style-type: none"> – No site specific sensitivities identified.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Provide access from Sycamore Lane or Woodlands Close. Detailed access arrangements will need to be investigated further. – Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – Existing surface water flow paths cross the site and there is a watercourse adjacent to the east of the site. Provide a Flood Risk Assessment (FRA) to inform the site layout and any necessary mitigation measures that may be required. – Design Surface Water Drainage to minimise run off to adjacent land, to incorporate SuDS and to ensure that Flood Risk is not increased.
<p>Contaminated Land</p>
<ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.
<p>Utilities</p>
<ul style="list-style-type: none"> – Upgrade to the Sewerage infrastructure network is required. Occupation of development should be phased to align with the delivery of sewerage infrastructure in liaison with the service provider.

SA 23			
Land at Hanlye Lane to the east of Ardingly Road, Cuckfield			
SHELAA:	479	Settlement:	Cuckfield
Gross Site Area (ha):	5.75	Number of Units:	55 dwellings
Description:	Housing allocation and formal and informal open space		
Ownership:	Private landowner		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5 years
Delivery Mechanisms:	Landowner in partnership with Developer		

SA23: Land at Hanlye Lane to the east of Ardingly Road, Cuckfield



Objectives

- To deliver a high quality, landscape led, sustainable extension to Cuckfield, which provides enhanced and accessible open space; respects the character of the village and the setting of the High Weald AONB; and which is comprehensively integrated with the settlement so residents can access existing facilities.

Urban Design Principles

- Provide development on the northern part of the site, creating a suitable development edge and transition with the open space that is to be retained to the south. As shown on the policy map, no development is to be provided on the southern field, south of the row of trees protected by Tree Preservation Orders, which is unsuitable for development as it is more exposed to views from the south, contributes to settlement separation and is crossed by rights of way providing scenic views towards the South Downs.
- Enhance the connectivity of the site with Cuckfield village by providing pedestrian and/or cycle links to Ardingly Road, Longacre Crescent and adjacent existing networks.
- Orientate development to have a positive active frontage in relation to the existing settlement and the wider countryside through careful masterplanning.

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements to minimise impacts on the setting of the High Weald AONB adjacent to the north and on the wider countryside.

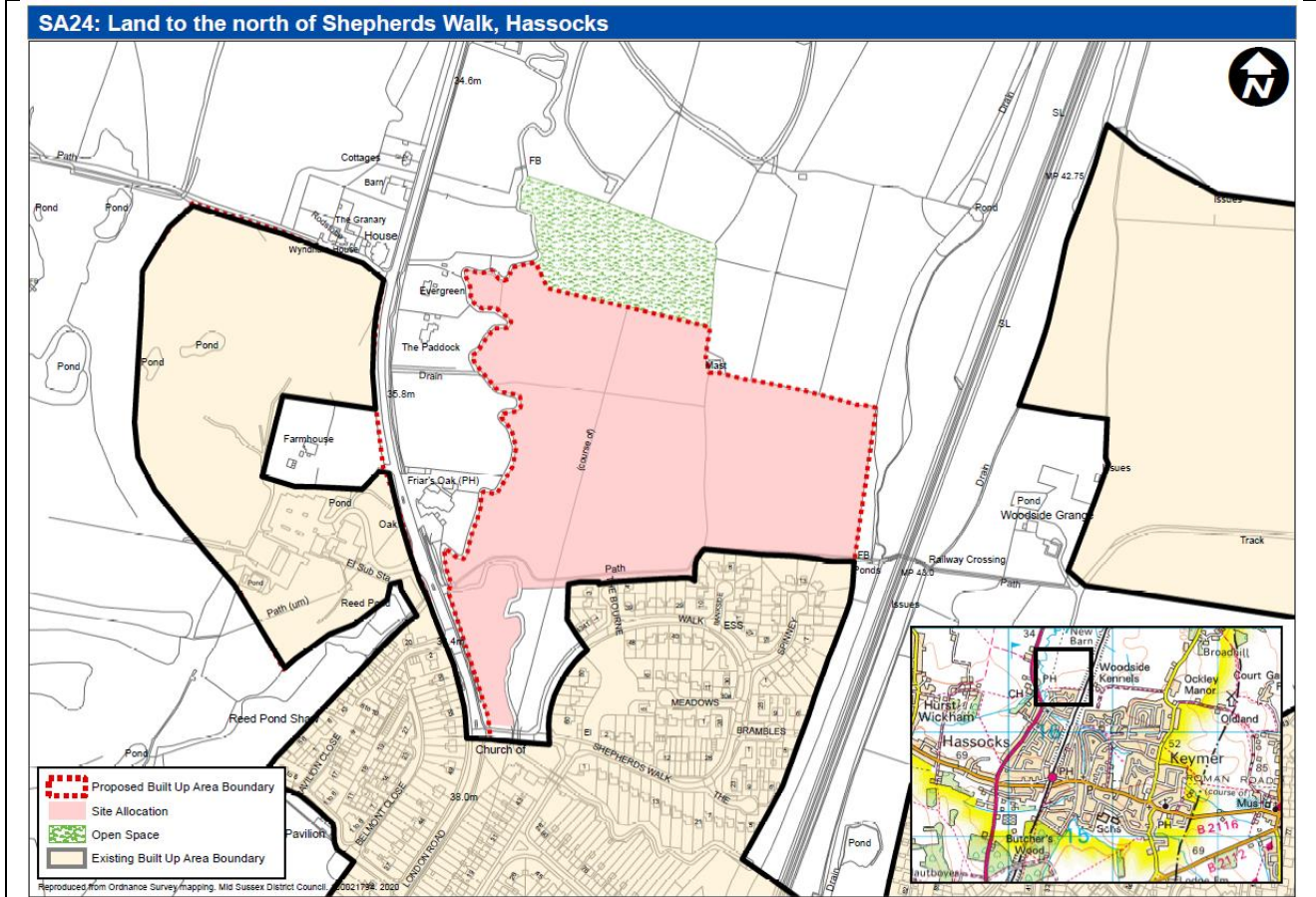
<ul style="list-style-type: none"> – Protect the rural character of Hanlye Lane and the approach to Cuckfield village by minimising the loss of the existing hedgerow and trees along the northern boundary. – Sensitively design the layout to take account of the topography of the site, and views into and out of the site. – The site contains a number of trees many with Tree Preservation Orders. Retain and enhance existing mature trees and hedgerows on the site, and on the boundaries, and incorporate these into the landscaping structure and Green Infrastructure proposals for the site in order to minimise impacts on the wider countryside. Open space should be provided as an integral part of this landscape structure. – Protect the character and amenity of the existing public footpaths that cross the site and seek to integrate these with the Green Infrastructure proposals and the footpath to the north.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Create a well connected area of open space on the land to the south, suitable for informal and formal recreation, that enhances and sensitively integrates the existing rights of way.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – The site is located near the crest of a sandstone ridge, in the High Weald a favourable location for archaeological sites. Carry out Archaeological assessment and appropriate mitigation arising from the results.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – The land to the south, as indicated on the Policies Map, is designated as a Semi Improved Grassland Priority Habitat. Manage this area to promote its conservation, restoration and enhancement in accordance with the Natural England management objectives for this type of habitat. – Undertake a holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area. – Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality. – Maintain a minimum buffer of 15 metres between the development and the north of Horsegate Wood ancient woodland.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Provide access from Hanlye Lane, the details of which need to be investigated. – Investigate whether any highway measures are required to mitigate impacts at the intersection of London Road (B2036) and Ardingly Road (B2114). – Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – The site is situated next to the village pond. The culverted pipe taking the outflow of the pond to the watercourse along the western boundary of the site to the southern field is in poor condition. Consider drainage works to improve the situation such as creating an open watercourse to avoid future blockage and capacity issues. – Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased. – Incorporate Sustainable Drainage Systems in the southern part of the site as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
<p>Contaminated Land</p>
<ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.
<p>Minerals</p>
<ul style="list-style-type: none"> – The site lies within the building stone (Cuckfield and Ardingly stone) Minerals Safeguarding

Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

Utilities

- Reinforcement of the sewerage network is required.
- Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

SA 24			
Land to the north of Shepherds Walk, Hassocks			
SHELAA:	221	Settlement:	Hassocks
Gross Site Area (ha):	10.5	Number of Units:	130 dwellings
Description:	Housing allocation with on site open space and equipped children's play area.		
Ownership:	Private land owner(s)		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Site in control of house builder.		



Objectives

- To deliver a high quality development, informed by a landscape led masterplan, which optimises the opportunities provided by Herrings Stream, to include notable biodiversity improvements, whilst creating a sympathetic extension to the settlement of Hassocks which protects the integrity of the Local Gap to the north.

Urban Design Principles

- Optimise the potential of the site through the masterplan process, whilst establishing a strong sense of place which is sympathetic to the landscape setting creating a central open space that gives the layout a focus.
- Provide a positive edge to the countryside by fronting-on to (and safeguarding) the field boundary/ mature trees.
- Ensure the site maximises connectivity with the existing settlement of Hassocks.
- Optimise the potential created by the landscape buffer through the creation of an additional biodiversity enhancements and opportunities for informal recreation adjacent to Herrings Stream.

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on the wider countryside.
- There are a number of trees covered by Tree Preservation Orders on the site. Existing

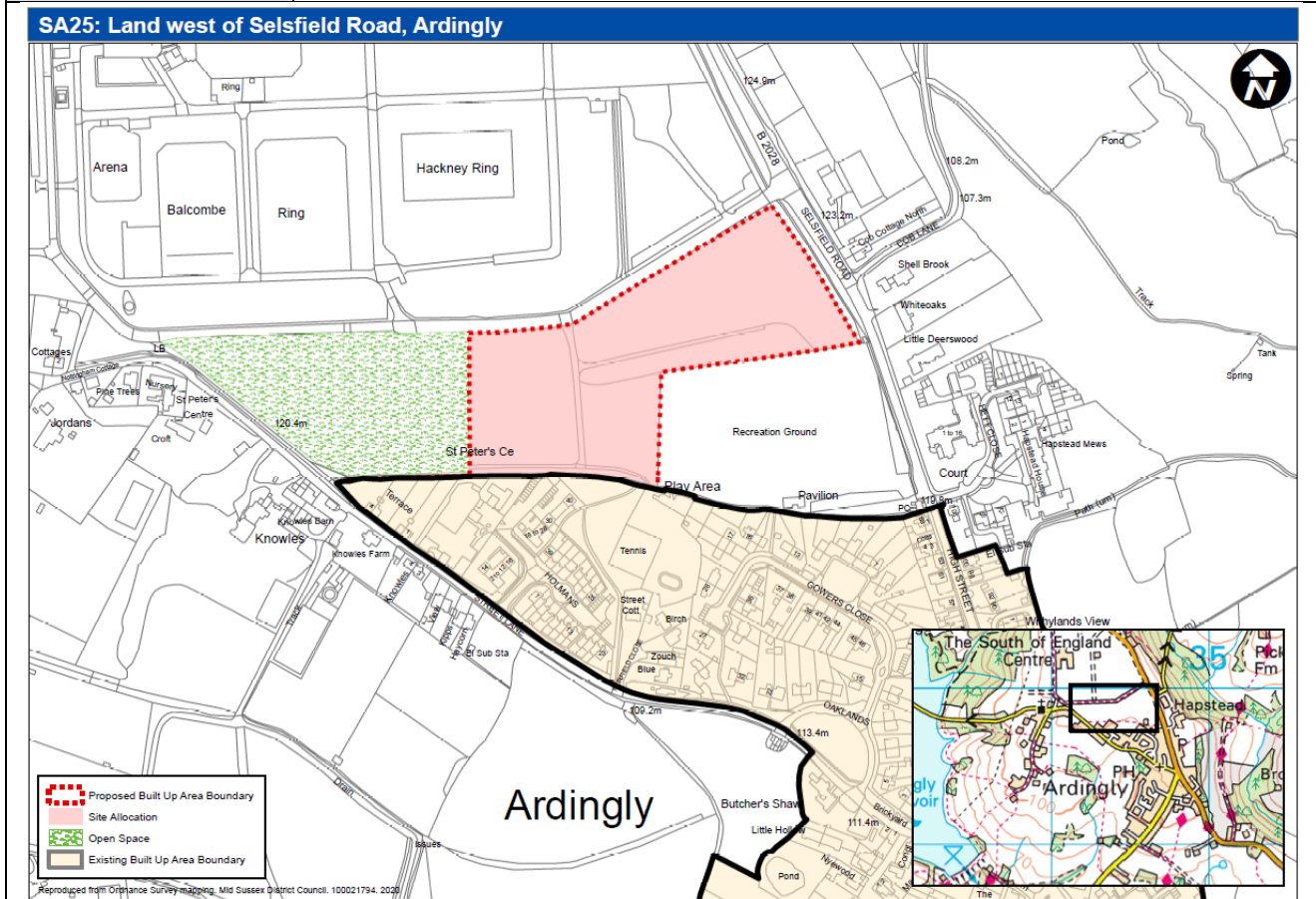
<p>hedgerows, mature and protected trees along the boundaries and within the site shall be retained, enhanced incorporating landscape buffers and incorporated into the landscape structure and layout of the development.</p> <ul style="list-style-type: none"> – Development proposals will need to protect the amenity and character of the existing public footpath which runs across the southern portion of the site, including where any diversion is necessary, providing new connections from the development where appropriate.
<p>Social and Community</p> <ul style="list-style-type: none"> – Provide an extension to Shepherds Walk open space to include an equipped children’s playspace. The land is to be transferred to MSDC with an agreed commuted sum to cover future management. – Ensure safe inclusive access across the railway line on the east boundary of the site through the provision of either a tunnel or footbridge.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Pre-determination evaluation and appropriate mitigation may be required. – Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.
<p>Air Quality / Noise</p> <ul style="list-style-type: none"> – An Air Quality Impact Assessment is required in accordance with up to date local guidance to assess the potential impacts on the Stonepound Crossroads Air Quality Management Area (AQMA) and shall identify practical mitigation where appropriate. – A noise assessment will be required to inform mitigation measures to reduce the impact of noise from the adjacent railway line.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements and protection of the flood plain area adjacent to Herrings Stream which runs along the western boundary of the site as a Green Infrastructure corridor. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure - provide a wildlife buffer and appropriate enhancements to Herrings Stream to improve biodiversity and habitat creation.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Provide a sustainable transport strategy identifying sustainable transport infrastructure improvements and demonstrating how the development will integrate with the existing network and provide safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks. – Investigate access arrangements onto London Road and make necessary safety improvements. – Access shall include footpaths to connect with the existing pedestrian network along London Road and improved pedestrian links to the existing Friar’s Oak bus stop. – Contribute towards improvements of Public Rights of Way (PRoW) across and in the vicinity of the site, including provision of safe access over the railway line on the east boundary of the site.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – The western boundary of the site borders a designated Main River (Herrings Stream) and its associated flood zones. Informed by a Flood Risk Assessment which identifies the flood extent, a sequential approach shall be applied to ensure development avoids the flood extent and shall include additional buffer zones for the 1 in 100 year event and include climate change allowances. – Access to the site is across the flood plain and shall be appropriately designed to ensure that flood risk is not increased and any necessary flood plain compensation is provided. – Safeguard Herrings Stream as part of any redevelopment and secure the long term protection and maintenance of the watercourse and landscape around it. – Surface Water Drainage shall be designed to incorporate SuDS and minimise run off from the site to ensure that Flood Risk is not increased.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the

potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

Utilities

- Southern Water’s Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 25			
Land west of Selsfield Road, Ardingly			
SHELAA:	832	Settlement:	Ardingly
Gross Site Area (ha):	5.17	Number of Units:	70 dwellings
Description:	Housing allocation with on site public open space.		
Ownership:	Private land owner		
Current Use:	Greenfield/parking for showground	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.		



Objectives

- To deliver a sympathetic and well integrated extension to the village of Ardingly informed by a landscape led masterplan, which conserves and enhances the landscape character of the High Weald AONB and the setting of nearby heritage assets.

Urban Design Principles

- Respect the distinctive character of the village and the existing settlement pattern.
- Orientate development to positively address existing and proposed areas of open space.
- Orientate development to have a positive edge to all site boundaries and to the adjacent recreation ground, facilitated by and including the removal of the existing bund providing a focal point for the development where sensitively designed higher density housing could be located; close boarded fencing should be avoided where visible from outside the site.
- Provide a permeable layout and enhance the connectivity of the site with Ardingly village and existing PRoW.

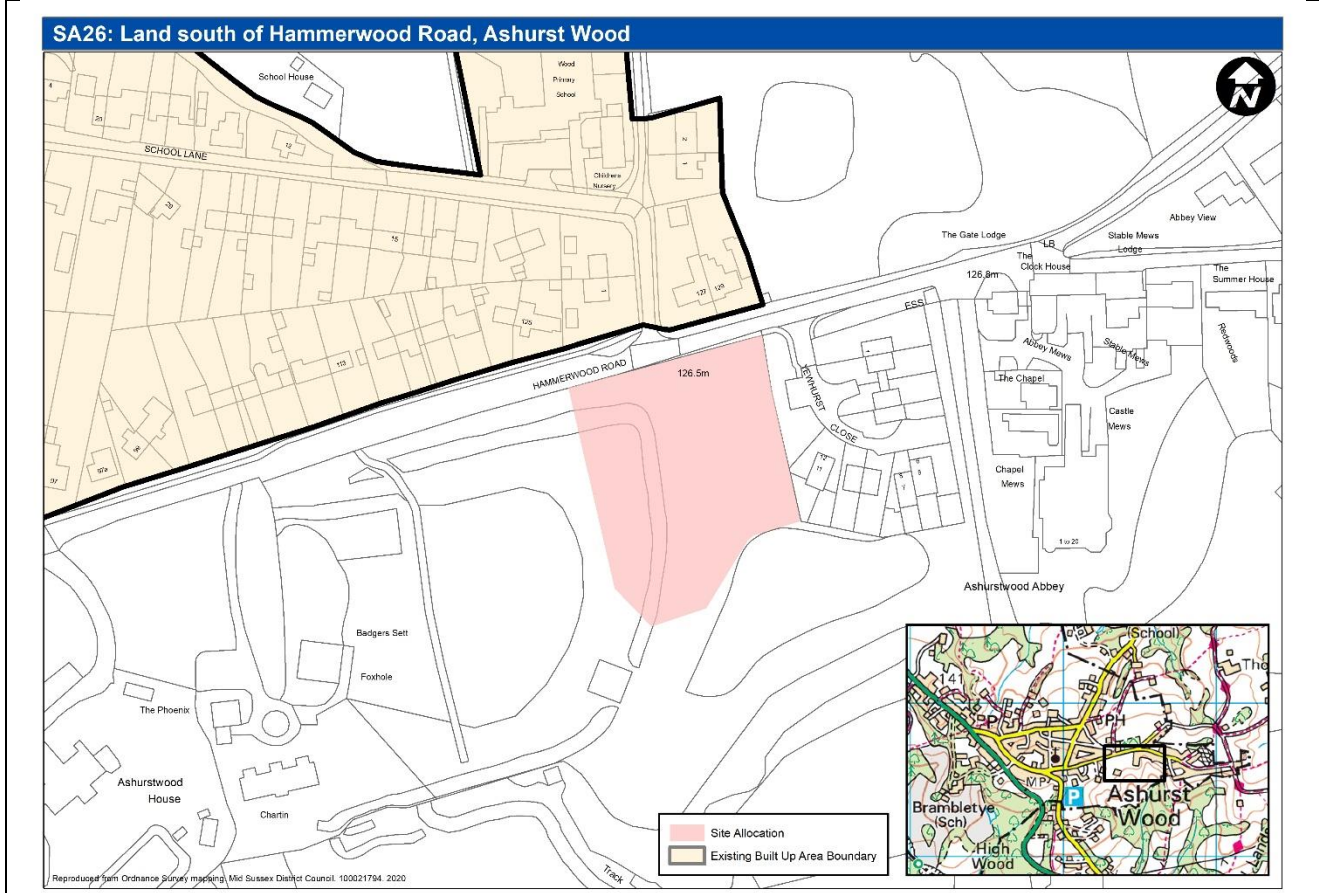
AONB

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape of the High Weald AONB, and minimise impacts on its special qualities, as set out in the High Weald AONB Management Plan.
- Retain and substantially enhance existing trees and hedgerows incorporating them into the

<p>landscape structure and layout of the development and reinstate the historic field boundary through the centre of the site adjacent to the area of open space to the west, with native species-rich hedgerow and native trees, incorporating the existing mature Oak tree.</p> <ul style="list-style-type: none"> – Incorporate retained landscape features into a strong new landscape setting, containing the new housing and limiting the impact on the wider landscape. – Protect and enhance the character and amenity of existing PRow which run along the northern and southern boundaries and provide connections from the new development.
<p>Social and Community</p> <ul style="list-style-type: none"> – In consultation with the Local Planning Authority, address requirements for suitably managed open space and equipped children’s playspace, either on-site or by financial contribution to upgrade existing adjacent facilities.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Provide appropriate design, layout and landscaping mitigation to protect the rural setting of the adjacent Ardingly Conservation Area and nearby listed St Peter’s Church (Grade I) and the listed group which surrounding the Church (Grade II); ensure development is not dominant in views from within the conservation area and the setting of the listed buildings. – Retain the western end of the site as an undeveloped area of public open space in order to protect the rural setting of these assets and maintain separation of the two historic cores of the village. – Establish the need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey shall be undertaken, the results of which will identify appropriate archaeological mitigation.
<p>Air Quality / Noise</p> <ul style="list-style-type: none"> – Noise assessment shall inform any necessary mitigation required to provide an acceptable standard of accommodation for each of the dwellings, arising from the Ardingly Showground operations.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing network providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks in Ardingly. – Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered. – Investigate access arrangements onto Selsfield Road and make necessary safety improvements.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Provide a Flood Risk Assessment which includes details of ground investigations and permeability testing to inform an appropriate method for disposal of surface water and explores the potential use of infiltration SuDS.
<p>Contaminated Land</p> <ul style="list-style-type: none"> – Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the building stone (Cuckfield and Ardingly stone) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated

Safeguarding Guidance.
Utilities
<ul style="list-style-type: none">– Occupation of development will be phased to align with the delivery of necessary sewerage infrastructure, in liaison with the service provider.– Southern Water’s Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 26			
Land south of Hammerwood Road, Ashurst Wood			
SHELAA:	138	Settlement:	Ashurst Wood
Gross Site Area (ha):	1.71	Number of Units:	12 dwellings
Description:	Housing allocation		
Ownership:	Private land owner(s)		
Current Use:	Workshop, woodland and grassland.	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development		



Objectives

- To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and sites well within the landscape of the High Weald AONB, retaining the sylvan, Parkland landscape character and semi-rural character of this section of Hammerwood Road.

Urban Design Principles

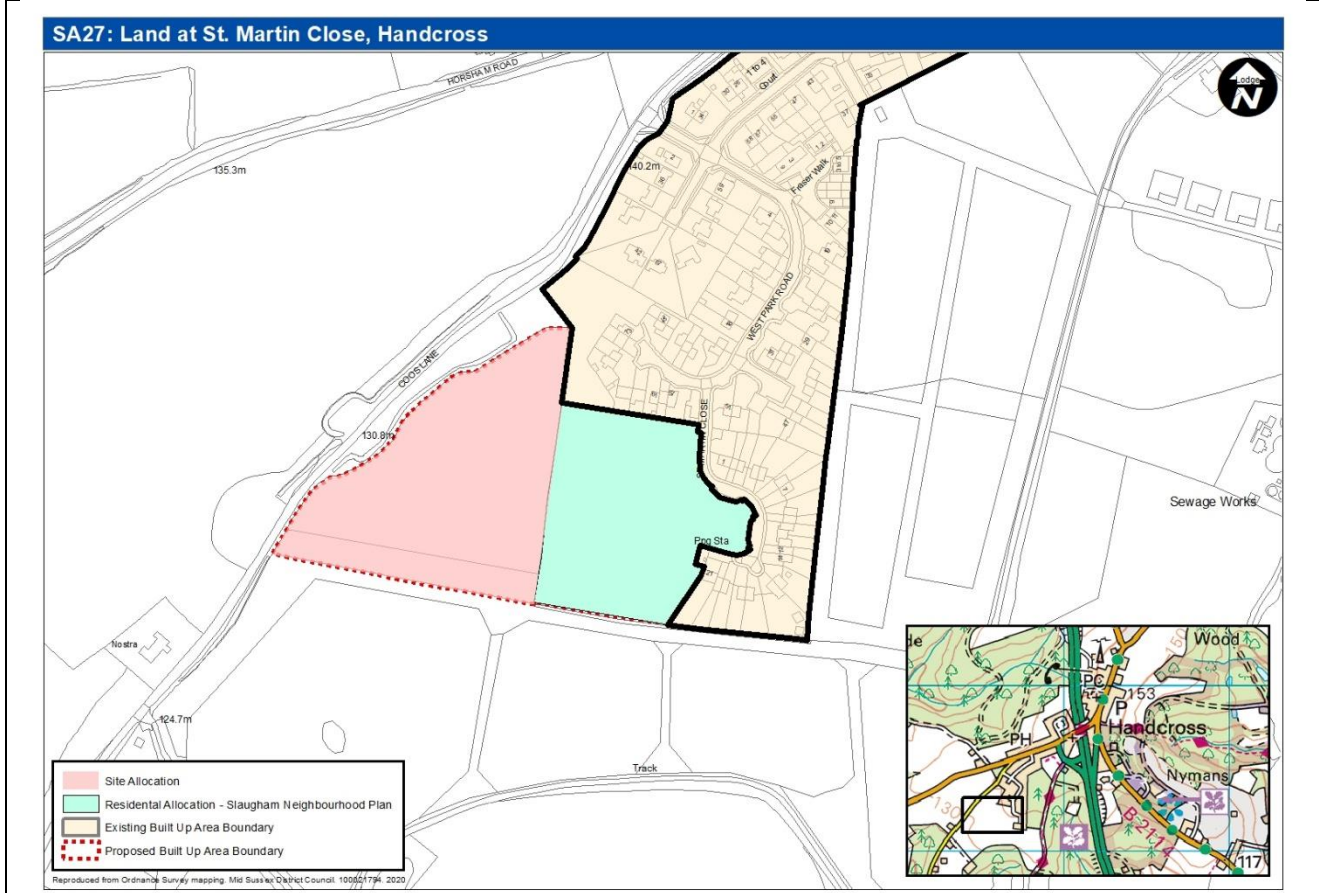
- Retain and protect the rural character of Hammerwood Road by retaining the existing hedgerow and trees along the northern boundary and complement and integrate the positive characteristics of Ashurst Wood in the design and layout.
- Concentrate development towards the northern part of the site, creating a soft transition with the countryside to the south.
- Orientate development to have a positive edge to Hammerwood Road and to the wider countryside to the south to avoid the use of hard boundary treatment along these boundaries.

AONB

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape and natural beauty of the High Weald AONB.
- Incorporate existing trees of significance and landscaping into the layout of development and provide new specimen tree planting, mixed native and evergreen planting into the landscape structure in order to retain the parkland setting and conserve the sense of place.

<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Impact on the nearby Herries Pasture a LWS and on-site wildlife habitat shall be fully considered and appropriate mitigation measures specified. – Restore and manage the areas of designated Deciduous Woodland Priority Habitat, introducing new parkland style mixed native planting and enhancing green corridors to the surrounding landscape and conserve and enhance habitats for native species. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Investigate the most suitable vehicular access arrangements from either Yewhurst Close or Hammerwood Road, taking account of landscape impacts and make necessary safety improvements and contribution towards sustainable transport infrastructure improvements.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Following any necessary remediation of previously contaminated land, Surface Water Drainage shall be designed to incorporate SuDS and minimise run-off, to ensure Flood Risk is not increased elsewhere. – Incorporate SuDS as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
<p>Contaminated Land</p> <ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses and is positioned over a secondary aquifer. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required to ensure there is no risk to human health and/or groundwater supplies.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the brick clay (Wadhurst clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 27			
Land at St. Martin Close, Handcross			
SHELAA:	127	Settlement:	Handcross
Gross Site Area (ha):	1.9	Number of Units:	35 dwellings at St Martin Close (West)
Description:	Housing and open space allocations		
Ownership:	Private landowner		
Current Use:	Grazing land	Indicative Phasing:	35 units 6 to 10
Delivery Mechanisms:	Landowner in partnership with developer		



Objectives

- The Slaugham Neighbourhood Plan allocates St Martin Close (East) for 30 dwellings (SNP: Policy 9 refers) and St Martin Close (West) as a Reserve site for 35 dwellings (SNP: Policy 10 refers). The Neighbourhood Plan identifies that the release of the Reserve site is to be triggered by a number of potential events, including the adopted Mid Sussex Site Allocations DPD and the need to allocate the site to meet the residual District housing requirement.
- This policy allocates St Martin Close (West) for housing and open space, subject to phasing as set out in the Neighbourhood Plan i.e. to come forward later within the Plan period following the delivery of St Martin Close (East). It seeks to ensure that a high quality, landscape led and coherent sustainable extension to Handcross is delivered, including integrated open space and access arrangements with that of St Martin Close (East).

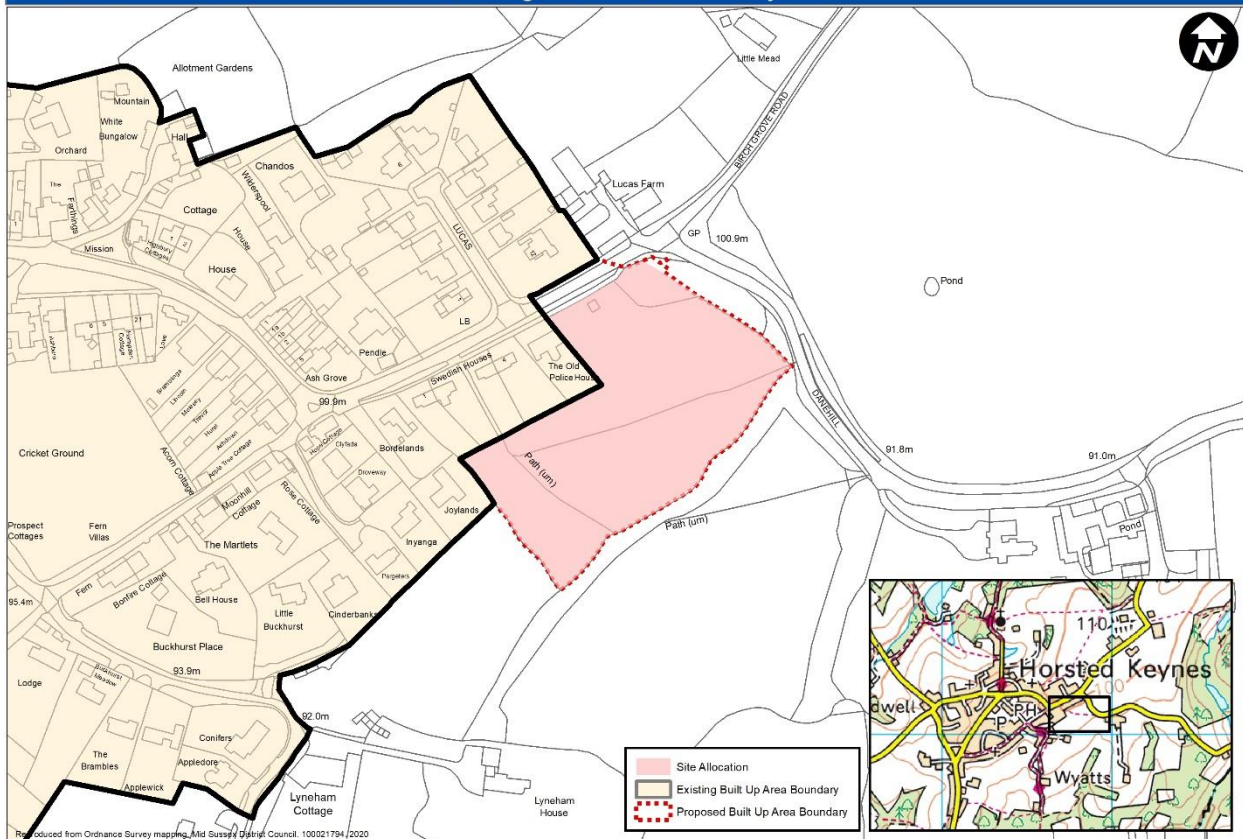
Urban Design Principles

- Provide a landscape led, coherent master-plan that involves integrated design, landscaping, access and open space arrangements with that of St Martin Close (East).
- Contribute towards local character and local needs of Handcross village and the High Weald AONB by providing a mix of dwelling types and sizes, including smaller terraces or flats, ensuring contextual architectural style and detailing.
- Enhance the connectivity of the site with Handcross village by providing pedestrian and/or cycle links to St Martin Close, West Park Road and Coos Lane.

<ul style="list-style-type: none"> – Orientate development with building frontages facing the tree lined field boundaries and open space to provide an attractive backdrop to the public realm and to avoid trees overshadowing back gardens.
<p>AONB</p>
<ul style="list-style-type: none"> – Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA), in order to conserve and enhance the landscape of the High Weald AONB, and to minimise impacts on its special qualities as set out in the High Weald AONB Management Plan. – Retain and enhance mature trees and planting along the boundaries of the site, incorporating these into the landscape structure and Green Infrastructure provision of the development to limit impacts on the wider countryside.
<p>Social and Community</p>
<ul style="list-style-type: none"> – Integrate the provision of open space between the two sites, and with the existing open space at West Park Road, to provide enhanced and connected open space facilities. The open space is to be accessible and inclusive to the local community.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – The site is located near the crest of a sandstone ridge in the High Weald, a favourable location for archaeological sites, requiring Archaeological Assessment and appropriate mitigation arising from the results.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Provide integrated access with St Martin Close (East). Access from Coos Lane is not acceptable for highway and landscape reasons.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased. – Layout to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes. A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout.
<p>Utilities</p>
<ul style="list-style-type: none"> – Underground wastewater infrastructure crosses the site. Ensure that the layout of the development enables future access to existing wastewater infrastructure for maintenance and upsizing purposes.

SA 28			
Land South of The Old Police House, Birchgrove Road, Horsted Keynes			
SHELAA:	807	Settlement:	Horsted Keynes
Gross Site Area (ha):	1.23	Number of Units:	25 dwellings
Description:	Housing allocation		
Ownership:	Private landowner		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with Developer		

SA28: Land south of The Old Police House, Birchgrove Road, Horsted Keynes



Objectives

- To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.

Urban Design Principles

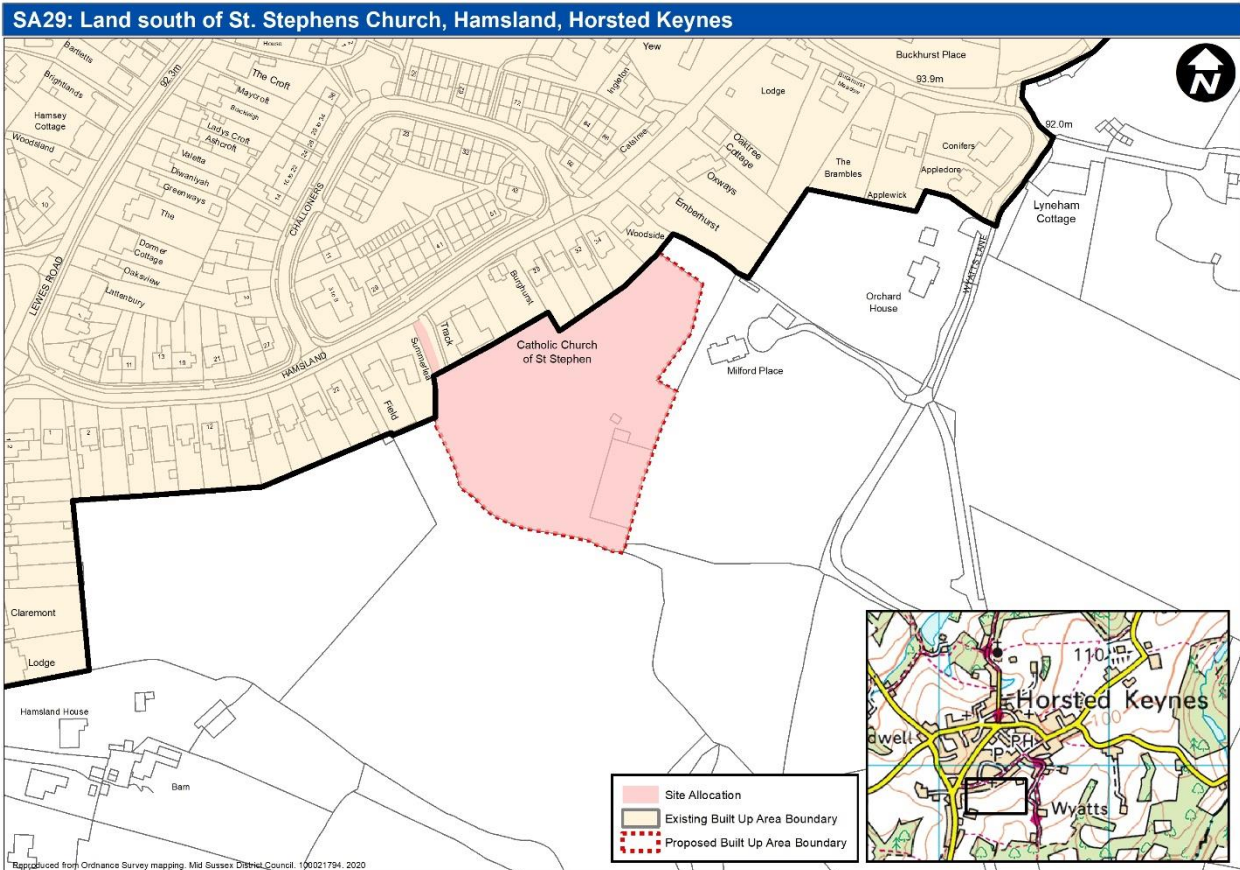
- Contribute towards local character and local needs of Horsted Keynes village by providing a mix of dwelling types and sizes, including a proportion of smaller terraces or flats, ensuring contextual architectural style and detailing in the design.
- Concentrate higher density development towards the northern part of the site to reflect the existing settlement pattern with a lower density around the edges to help create a suitable transition with the countryside.
- Seek to enhance the connectivity of the site with Horsted Keynes village by providing pedestrian and/or cycle links to adjacent networks.
- Orientate development to have a positive active frontage in relation to the existing settlement and to define open spaces and routeways.

AONB

- Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA) in order to conserve and enhance the landscape of the High Weald AONB, and minimise impacts on its special qualities, as set out in the High Weald AONB Management Plan.

<ul style="list-style-type: none"> – Identify and protect important views into and out of the site with proposals laid out so that views are retained and, where possible, enhanced to improve both legibility and the setting of development. – Protect the rural character of Birchgrove Road and this edge of settlement by retaining, where possible, the Oak tree and hedgerow on the frontage of the site. – Retain important mature trees and hedgerows along the eastern, southern and western boundaries of the site, and incorporate these into the landscape structure and Green Infrastructure proposals of the development to limit impacts on the wider countryside. Open space should be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme. – Protect the character and amenity of the existing public footpath (a historic routeway) that crosses the site and seek to integrate this with the Green Infrastructure proposals for the site.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Provide appropriate mitigation to protect the rural setting and historic farmstead of the Grade II listed Lucas Farm to the north of the site by creating a sufficiently sized landscape buffer at the north eastern corner of the site and by retaining and enhancing the tree belt on the eastern boundary. The mitigation strategy should be informed by a Heritage Impact Assessment. – Conserve the setting of the Horsted Keynes Conservation Area by ensuring that development is not dominant in views through appropriate design and landscaping. The mitigation strategy should be informed by a Heritage Impact Assessment. – The site is located near the crest of a sandstone ridge in the High Weald, a favourable location for archaeological sites, requiring Archaeological Assessment and appropriate mitigation arising from the results.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Provide access from Birchgrove Road, ensuring sufficient visibility splays are provided with the junction with Danehill Lane. – Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – The site lies within a Groundwater Source Protection Zone 3. Development proposals will need to demonstrate that there is no significant harm caused to groundwater resources. – Manage surface water to minimise flood risk and flows to watercourses and incorporate SuDS as an integral part Green Infrastructure provision to improve biodiversity and water quality. The design and layout of the SuDS will need to be informed by ground investigation and permeability testing, and take into account the location of the site within a Groundwater Source Protection Zone.

SA 29			
Land south of St. Stephens Church, Hamsland, Horsted Keynes			
SHELAA:	184	Settlement:	Horsted Keynes
Gross Site Area (ha):	1.13	Number of Units:	30 dwellings
Description:	Housing allocation		
Ownership:	Private landowner		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with Developer		



Objectives

- To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.

Urban Design Principles

- Contribute towards the local character and local needs of Horsted Keynes village and the High Weald AONB by providing a mix of dwelling types and sizes, including a proportion of smaller terraces or flats, ensuring contextual architectural style and detailing in the design of the development.
- Enhance the connectivity of the site with Horsted Keynes village by providing pedestrian and/or cycle links to Hamsland and adjacent networks.
- Orientate development to provide a positive active frontage in relation to the existing settlement, open space and attractive tree belts.
- Concentrate higher density development towards the northern part of the site, reflecting the existing settlement pattern, with a lower density around the edges to create a suitable transition with the countryside.

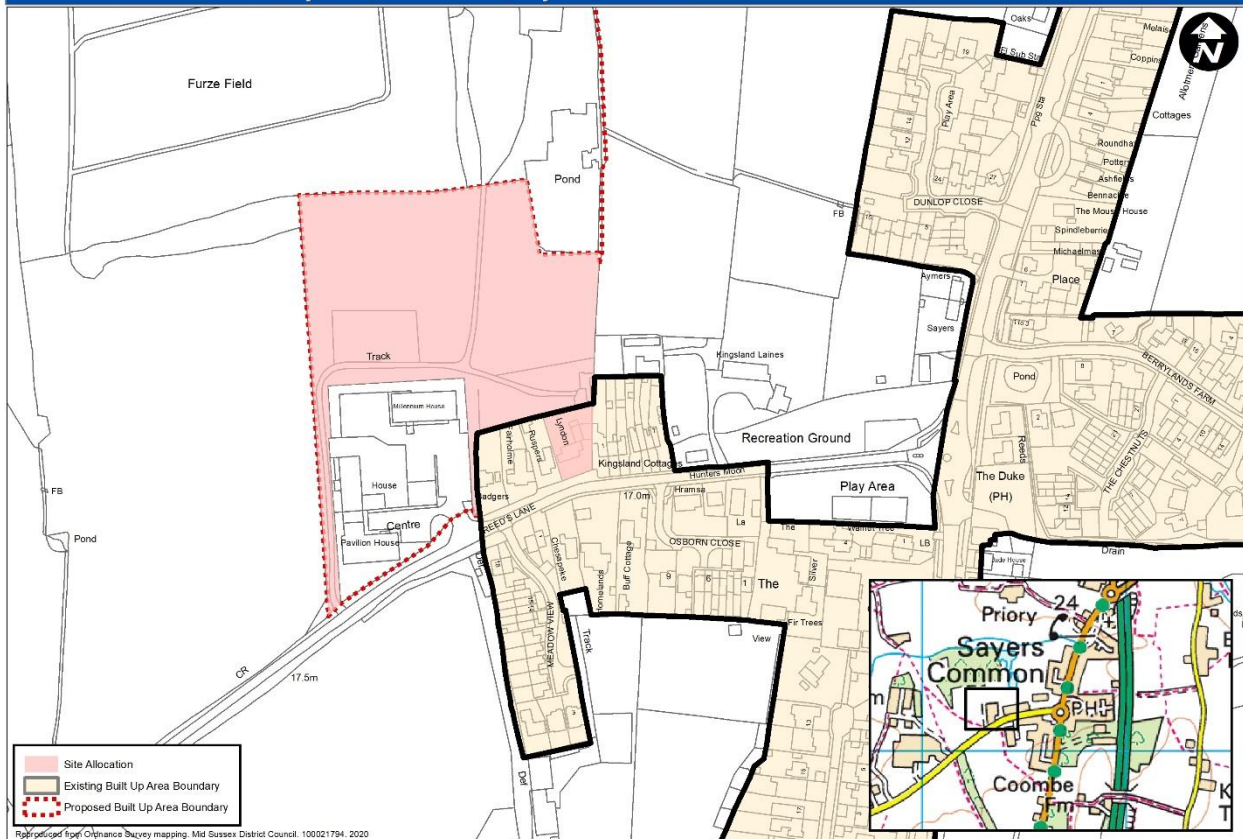
AONB

- Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA) in order to conserve and enhance the landscape of the High Weald AONB, and minimise impacts on its special

<p>qualities as set out in the High Weald AONB Management Plan.</p> <ul style="list-style-type: none"> – Identify and protect important views into and out of the site with proposals laid out so that views are retained and, where possible enhanced to both improve legibility and the setting of development. – Retain and enhance important landscape features, mature trees and hedgerows and incorporate these into the landscape structure and Green Infrastructure proposals for the development to limit impacts on the wider countryside. Open space is to be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.
<p>Historic Environment and Cultural Heritage</p> <ul style="list-style-type: none"> – Provide appropriate mitigation to protect the rural setting of the Grade II listed Wyatts to the south of the site by enhancing the boundary tree belt at the south western corner, and ensuring that development is not dominant in views from the listed building. The mitigation strategy is to be informed by a Heritage Impact Assessment. – The site is located near the crest of a sandstone ridge in the High Weald, a favourable location for archaeological sites, requiring Archaeological Assessment and appropriate mitigation arising from the results.
<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Access is to be provided from Hamsland. Detailed access arrangements will need to be investigated further. – Investigate opportunities to set the access away from the trees on the site boundary to protect the existing trees. – Improve local traffic conditions by setting back the existing on-street parking spaces in Hamsland into the verge opposite the site. – Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Design Surface Water Drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased. – Provide SuDS in the southern part of the site as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
<p>Contaminated Land</p> <ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.

SA 30			
Land to the north Lyndon, Reeds Lane, Sayers Common			
SHELAA:	829	Settlement:	Sayers Common
Gross Site Area (ha):	2.01	Number of Units:	35 dwellings
Description:	Housing allocation		
Ownership:	Private landowner		
Current Use:	Former brickyard now greenfield	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with Developer		

SA30: Land to the north of Lyndon, Reeds Lane, Sayers Common



Objectives

- To deliver a high quality, landscape led, sustainable extension to Sayers Common, which respects the character of the village and the setting of the adjacent countryside, and which is comprehensively integrated with the settlement so residents can access existing facilities.

Urban Design Principles

- Ensure the design and layout of this site respects that of the adjacent site at Kingsland Laines to the east through careful masterplanning.
- Enhance connectivity with Sayers Common village by providing pedestrian and/or cycle links to adjacent existing networks.
- Orientate development to provide a positive active frontage in relation to the existing settlement, neighbouring site to the east and to define open spaces and routeways.

Landscape Considerations

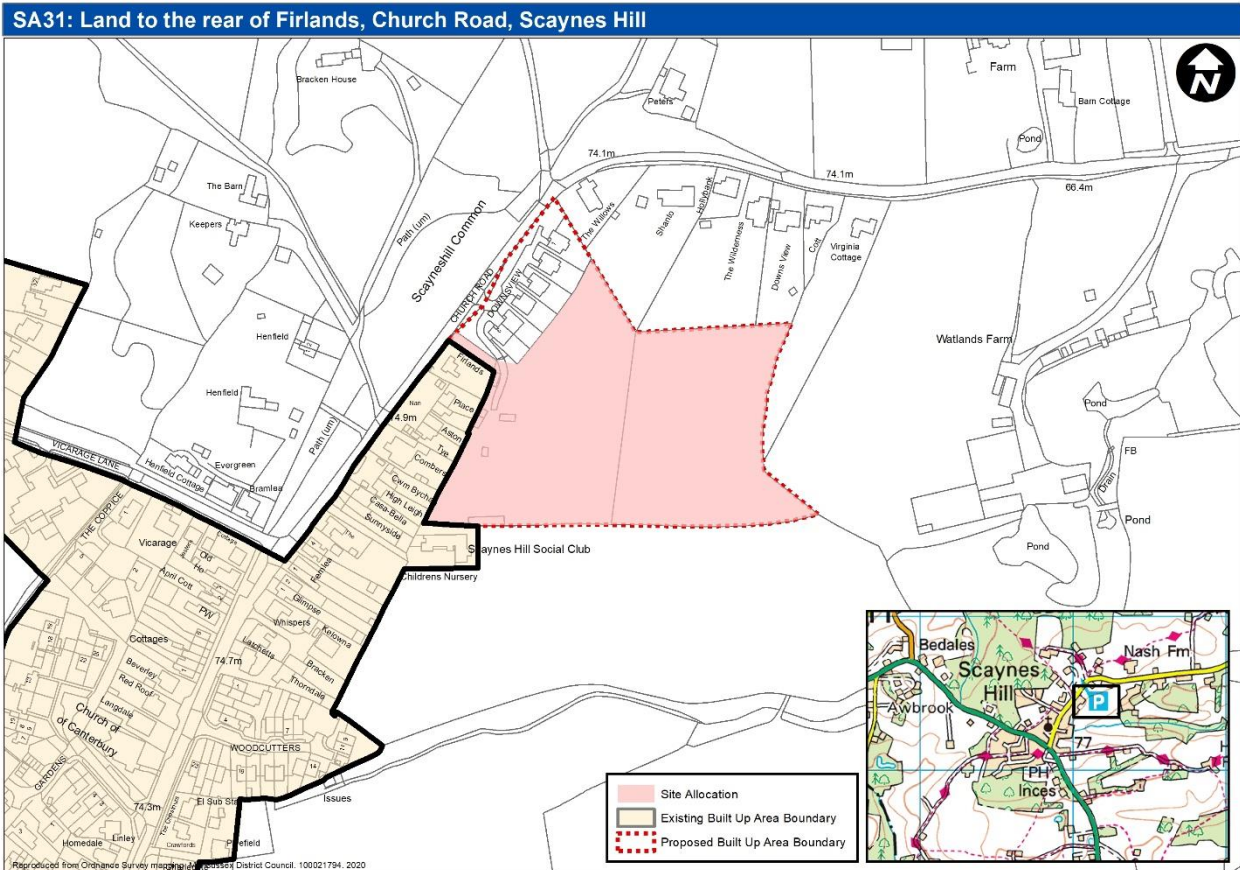
- Retain and enhance existing mature trees and hedgerows on the site and on the boundaries, and incorporate these into the landscaping structure and Green Infrastructure proposals for the site to limit impacts on the wider countryside.
- Open space is to be provided as an integral part of this landscape structure, making a feature of trees and landscaping and should be prominent and accessible within the scheme.

Historic Environment and Cultural Heritage

- The site may contain buried archaeology. Carry out archaeological assessment and appropriate

mitigation arising from the results.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
Highways and Access
<ul style="list-style-type: none"> – Access to the site will require the demolition of the bungalow Lyndon that fronts onto Reeds Lane. Detailed access arrangements will need to be investigated further.
Flood Risk and Drainage
<ul style="list-style-type: none"> – The site is adjacent to watercourses that also take surface water run-off from other parts of Sayers Common. This flood risk will reduce the developable areas and affect how surface water is disposed from the site. Provide a site specific Flood Risk Assessment (FRA) to identify areas which are susceptible to surface water flooding to inform the site layout and any necessary mitigation measures. – Consider the method of disposal of surface water from this site taking into account that the watercourses are in an area of high surface water flood risk. – Incorporate SuDS as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
Minerals
<ul style="list-style-type: none"> – The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 31			
Land to the rear Firlands, Church Road, Scaynes Hill			
SHELAA:	897	Settlement:	Scaynes Hill
Gross Site Area (ha):	2.2	Number of Units:	20 dwellings
Description:	Housing allocation		
Ownership:	In control of a house builder		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development		



Objectives

- To deliver a sympathetic extension to Scaynes Hill which works with the contours of the site, focusing development on the more level eastern portion of the site, set within a new landscape structure to contain the new housing and limit the impact on the wider landscape.

Urban Design Principles

- Respect the character of the village and the existing settlement pattern through the layout and design of the development, concentrating on the western section abutting existing development.
- Ensure development works with the grain of the landscape, focusing built form within the flatter western area of the site, avoiding the need for cut and fill to address topographical constraints.
- Orientate development to have a positive edge with the countryside to the southern and eastern boundaries, with buildings fronting onto an enhanced tree screen.

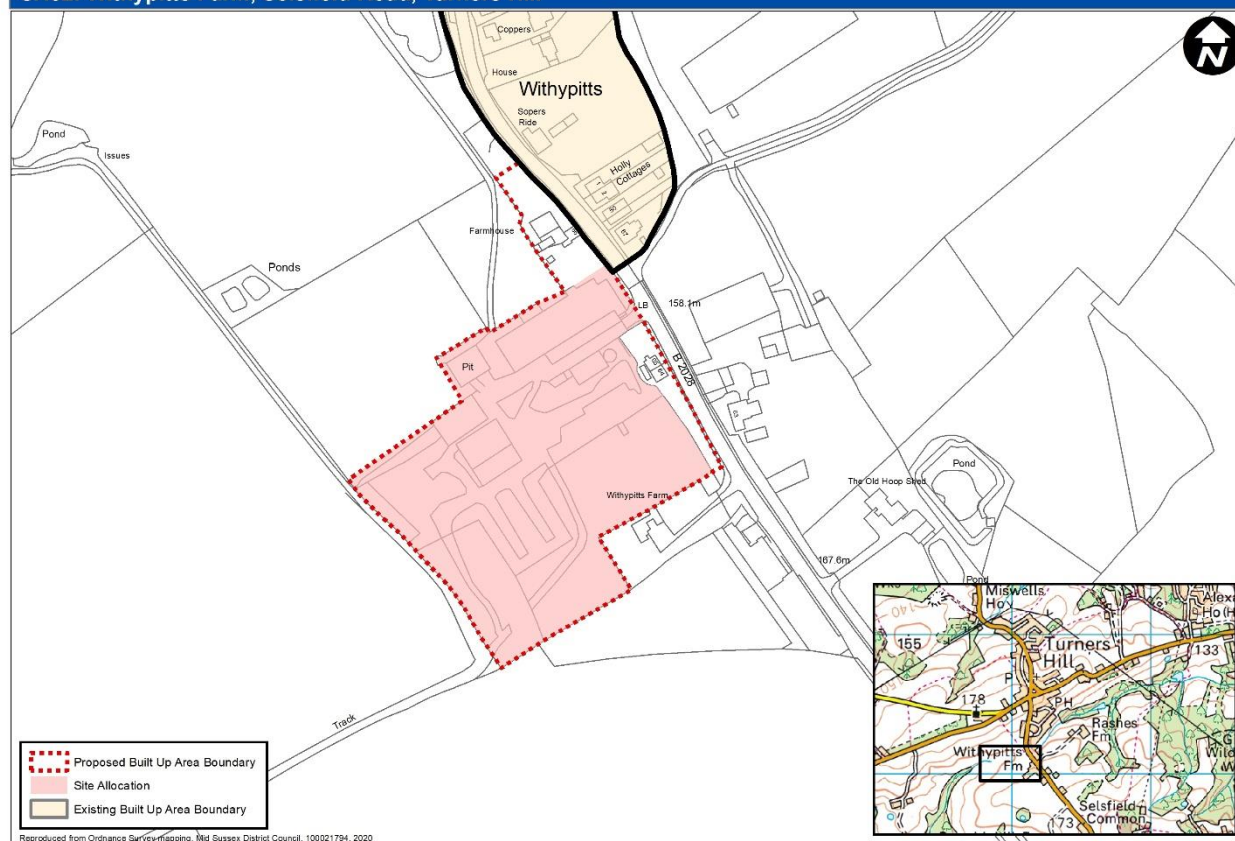
Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on the wider countryside.
- Retain and substantially enhance existing landscape structure, integrating existing hedge and tree boundaries to contain new housing and limit the impact on the wider landscape.
- Development proposals will need to protect the character and amenity of existing PRow which runs along Clearwater Lane to the south, by containing development within a new landscape setting.

<p>Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss. – Retain and enhance existing hedgerows retaining a minimum of a 5 metre buffer to development and provide new native tree planting and species-rich hedgerows to provide a green corridor network. – Exploit the undeveloped south-eastern area of the site for landscape and ecological enhancements and public open space. – Undertake an assessment of any impacts on Scaynes Hill Common Local Wildlife Site (LWS) and Costells, Henfield and Nashgill Woods LWS shall be made and appropriately mitigated against. Unavoidable damage to biodiversity must be off-set through ecological enhancement and mitigation measures to ensure there is a net gain in biodiversity.
<p>Highways and Access</p> <ul style="list-style-type: none"> – Investigate access arrangements onto Church Road and make necessary safety improvements and provide safe and convenient routes for walking and cycling through the site and contribute towards sustainable transport infrastructure.
<p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> – Informed by permeability testing, design surface water drainage to minimise run off and incorporate SuDS to ensure that Flood Risk is not increased. – Any SuDS shall be an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.
<p>Minerals</p> <ul style="list-style-type: none"> – The site lies within the building stone (Cuckfield and Ardingly stone) Mineral Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 32			
Withypitts Farm, Selsfield Road, Turners Hill			
SHELAA:	854	Settlement:	Turners Hill
Gross Site Area (ha):	1.7	Number of Units:	16 dwellings
Description:	Housing allocation.		
Ownership:	Private land owner		
Current Use:	Active farmstead	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.		

SA32: Withypitts Farm, Selsfield Road, Turners Hill



Objectives

- To deliver a farmstead character redevelopment which retains existing buildings of historic value and capable of conversion, which conserves and enhances the character of the High Weald AONB.

Urban Design Principles

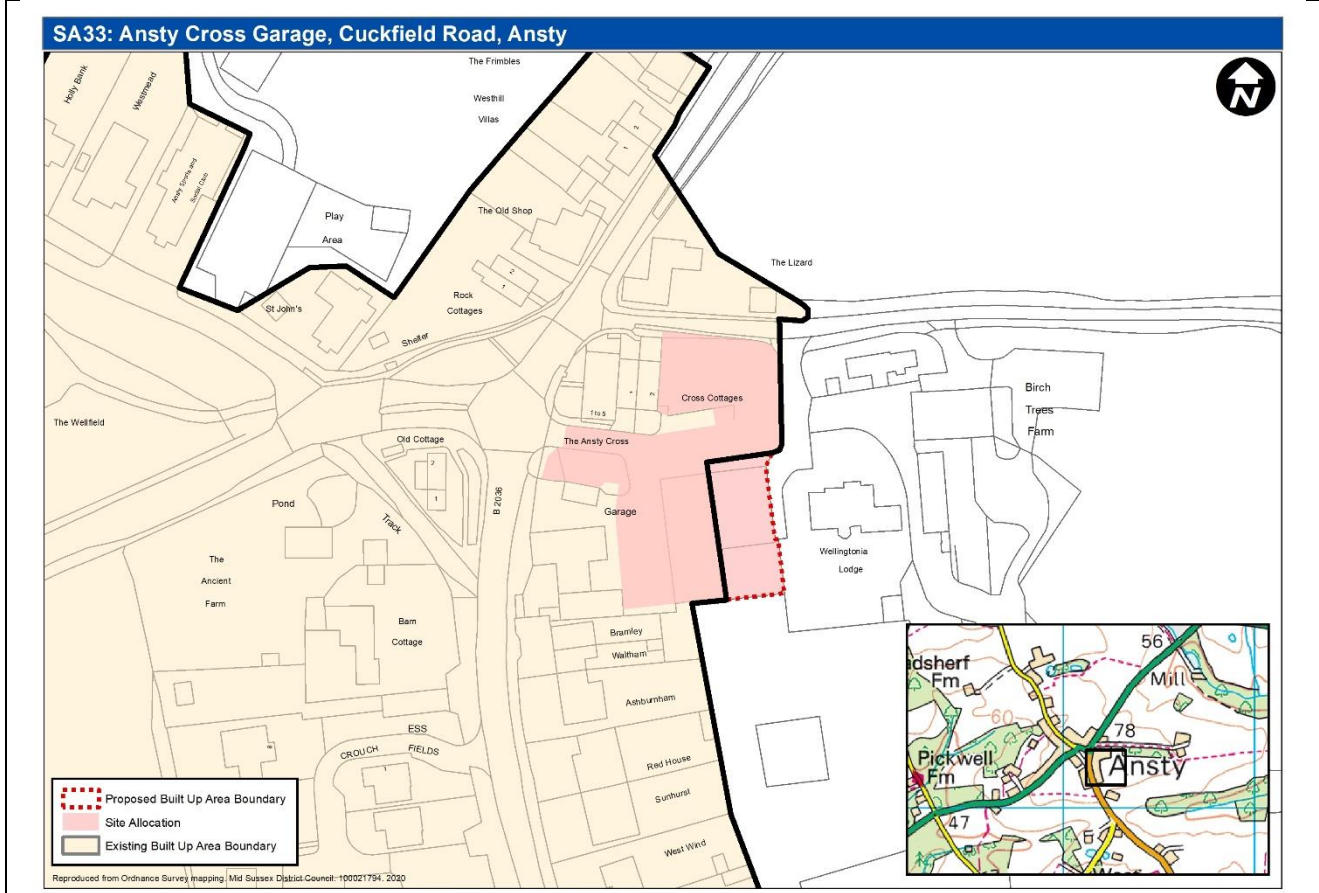
- Enhance local landscape character and views with a high quality development with a farmstead character utilising any existing buildings which are capable of being retained, set within a landscape setting.
- Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.

AONB

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape of the High Weald AONB, and minimise impacts on its special qualities, as set out in the High Weald AONB Management Plan.
- Avoid development on the higher and more visible areas of the site in order to conserve and enhance landscape views.
- Retain and enhance with native tree species the the existing Scots Pine tree belt on the western boundary and provide additional tree planting along the southern and eastern boundaries.
- Provide a robust native hedge with trees along the north boundary of the site to reinforce the

<p>field patterns and soften the visible built form.</p> <ul style="list-style-type: none"> – Avoid use of close boarded fencing adjacent to any site boundaries where it will be visible in wider views. – Development proposals will need to protect the character and amenity of existing PRow to the north of the site.
<p>Historic Environment and Cultural Heritage</p>
<ul style="list-style-type: none"> – Informed by a Heritage Assessment and structural survey, utilise existing buildings of historic value that are capable of conversion; new development should be focused on areas with existing and previous historic built form. – Provide a layout that retains the farmstead character of the site. Any new development should respect this character in the design, incorporating materials which complement those on the existing historic buildings.
<p>Biodiversity and Green Infrastructure</p>
<ul style="list-style-type: none"> – Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements within the site connecting to the surrounding area. – Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
<p>Highways and Access</p>
<ul style="list-style-type: none"> – Investigate access arrangements onto Selsfield Road and make necessary safety improvements and contribute towards sustainable transport improvements. – Provide safe and convenient routes for pedestrians and cyclists through the site.
<p>Flood Risk and Drainage</p>
<ul style="list-style-type: none"> – Following any necessary remediation of previously contaminated land and informed by permeability testing, Surface Water drainage shall be designed to incorporate SuDS and minimise run-off to ensure that Flood Risk is not increased.
<p>Contaminated Land</p>
<ul style="list-style-type: none"> – The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required.
<p>Minerals</p>
<ul style="list-style-type: none"> – The site lies within the brick clay (Wadhurst clay) and the Building Stone (Ardingly and Cuckfield) Minerals Safeguarding Areas, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 33			
Ansty Cross Garage, Cuckfield Road, Ansty			
SHELAA:	644	Settlement:	Ansty
Gross Site Area (ha):	0.24	Number of Units:	12 dwellings
Description:	Housing allocation		
Ownership:	Private land owner		
Current Use:	Commercial garage and car parking	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development		



Objectives

- To optimise the capacity of the site and deliver a development which positively addresses Cuckfield Road and relates well to the adjacent Cross Cottages whilst retaining the rural character of the lane to the north of the site.

Urban Design Principles

- Retain the existing mature vegetation adjacent to the rural lane to the north of the site and avoid the use of hard boundary treatment to protect the rural character.
- Provide a comprehensive landscape scheme to enhance the setting and provide an appropriate buffer to the service station.
- Carefully integrate parking into the layout to ensure it does not dominate the development.

Landscape Considerations

- Protect the rural character of the lane to the north of the site.

Historic Environment and Cultural Heritage

- Protect the remaining rural character of the setting of the adjacent Grade II listed buildings at The Ancient Farm and Old Cottage by careful treatment of the frontage to the west of the site.

Air Quality / Noise

- A noise assessment shall inform any necessary mitigation required to provide an acceptable standard of accommodation for each of the dwellings, arising from the Ansty Service Station

operations.
Biodiversity and Green Infrastructure
– Provide a net gain in biodiversity and Green Infrastructure, taking account of the wider ecological context, creating additional habitat in the construction of the building, including where appropriate integral bat and bird boxes, and inclusion of well designed diverse landscaped areas with native species.
Highways and Access
– Investigate access onto the Cuckfield Road and make necessary safety improvements avoiding creating a new access onto the narrow lane to the north and contribution towards sustainable transport infrastructure improvements.
Flood Risk and Drainage
– Following any necessary remediation of previously contaminated land, Surface Water Drainage shall be designed to incorporate SuDS and significantly reduce any run off and to ensure Flood Risk is not increased.
Contaminated Land
– The land may be contaminated due to present or historical on site or adjacent land uses and is positioned over a secondary aquifer. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required to ensure there is no risk to human health and/or groundwater supplies.
Utilities
– Southern Water’s Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

3. Development Policies

- 3.1 The District Plan 2014-2031 sets out a comprehensive suite of forty two strategic policies to inform development across the district. The plan's policies seek to achieve a balance between delivering new housing, supporting economic growth and protecting the district's high quality natural and built environment.
- 3.2 In addition to the Sites DPD policies relating to site allocations (Policies SA1 to SA33), the District Plan policies are complemented, by five additional strategic policies that are set out in the following section. These policies help to ensure that the Development Plan supports the delivery of sustainable development when considered as a whole. In the case of **SA38: Air Quality**, this policy replaces the relevant Air Quality section of **DP29: Noise, Air and Light Pollution**.
- 3.3 The additional policies included within the Sites DPD cover the following areas:
- **SA34: Existing Employment Sites**
 - **SA35: Safeguarding of Land for Strategic Highway Improvements**
 - **SA36: Wivelsfield Railway Station**
 - **SA37: Burgess Hill/ Haywards Heath Cycle Network**
 - **SA38: Air Quality**
- 3.4 The review of the District Plan, to commence in 2020 will provide a further opportunity to update the Council's policies to support sustainable development if required.

Existing Employment Sites

- 3.5 District Plan Policy **DP1: Sustainable Economic Development** sets out the policy position related to making effective use of employment land and premises. The policy provides broad support for intensification, conversion, redevelopment and/or extension provided it is in accordance with other policies in the plan. It also seeks to protect allocated and existing employment land.
- 3.6 Since the District Plan was adopted in March 2018, the Council have approved an updated Economic Development Strategy (EDS) (April 2018). The aim of the EDS is to make Mid Sussex a vibrant and attractive place for businesses and people to grow and succeed. The EDS sets out a number of success measures, broadly within four priority themes:
- Places
 - People
 - Premises
 - Promotion
- 3.7 Regarding the Premises theme, the EDS aims to increase the amount of business floorspace in the District, as well as minimising the loss of floor space. The following policy (**SA34: Existing Employment Sites**) supplements District Plan Policy DP1 by providing additional policy requirements relating to the protection of existing sites, whilst supporting their growth where appropriate.

SA34: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

Existing Employment Sites, classified as those in use classes B1: Business, B2: General Industrial or B8: Storage or Distribution (as shown in **Appendix A** and on the policies map) are protected; proposals that would involve their loss will be resisted. Proposals on Existing Employment Sites that would involve the loss of employment land or premises will only be supported where it can be clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use.

Proposals for intensification within the boundary of Existing Employment Sites will be supported providing it is in accordance with other development plan and national policies.

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown in **Appendix A** and on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace. Proposals for alternative uses, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

Existing Employment Areas – Expansion

Within the built-up area, expansion of Existing Employment Sites and premises for B1/B2/B8 uses will be supported where the business requirements cannot be met within the existing site/premises through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.

Outside the built-up area, expansion of Existing Employment Sites for B1/B2/B8 uses will only be supported where:

- Detailed layout and design are in keeping with its countryside location
- The expansion is contiguous with the boundary of an existing employment site
- Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.

Safeguarding of Land for Strategic Highway Improvements

3.8 Mid Sussex is well placed to allow easy movement for people, giving good access to jobs, with many commuting to London and the area benefits from excellent rail-based public transport connectivity, particularly along the Brighton Main Line that connects to Gatwick Airport, London and the south coast. However, the district's location within the Gatwick Diamond, particularly with high volumes of commuters and freight passing through, has led to a number of transport related constraints. In particular, these include:

- road congestion during peak periods affects many parts of the highway network throughout the district; most notably:
 - M23/A23 corridor which is congested at key junctions; A23/A2300 Hickstead, A23/A272 Bolney, A23/A264 Pease Pottage and M23 J10 Copthorne
- East Grinstead is affected by the A264 and the A22 passing through the town centre and high car dependency due partially to the lack of a direct rail connection to the Crawley / Gatwick Airport area and bus journey times can be uncompetitive;

- Haywards Heath is particularly affected by the A272 passing around the town and high car dependency;
 - Burgess Hill suffers from congestion due to the lack of crossing points for vehicles crossing the Brighton Main Line within the town and high car dependency; and
 - there is a lack of good public transport operating within the rural locations meaning that individuals with no access to private cars have limited options for accessing key services such as hospitals, shops and leisure facilities.
- 3.9 A Strategic Objective of the District Plan 2014 - 2031¹³ is to ensure that development is accompanied by the necessary infrastructure to support new development and **DP 21: Transport** ensures that development supports the objectives of the West Sussex Transport Plan 2011 – 2026 and contributes towards delivering sustainable development and appropriate infrastructure.
- 3.10 The West Sussex Transport Plan 2011 – 2026¹⁴ outlines a strategy for Mid Sussex that seeks to tackle the identified transport issues, partly through seeking external funding sources to deliver new infrastructure and by ensuring that new development contributes to delivering the strategy. It is stated that all new developments should contribute to:
- improving public transport facilities and networks
 - increasing the use of sustainable modes of transport
 - improving network efficiency in order to reduce delays and emissions
 - improving safety for all road users, and
 - improving the public rights of way network in accordance with the RoWIP.
- 3.11 Development identified in the District Plan 2014 – 2031 is accompanied by a committed list of highway infrastructure to be constructed in Mid Sussex and neighbouring districts by 2031. These schemes have been identified in partnership with West Sussex County Council and other key stakeholders. Details of the highway and transport infrastructure already identified is as set out within the Transport Assessment Report¹⁵.
- 3.12 Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant corridor) have been fully explored and have been taken into account in terms of their level of mitigation.
- 3.13 The additional development proposed by the Site Allocations DPD has been subject to further technical investigations, working in partnership with West Sussex County Council and further highway and transport infrastructure has been identified to ensure that proposed development is sustainable.
- 3.14 The planning and funding of highway and transport infrastructure can take time to prepare and it is therefore important the Development Plan is not compromised by inappropriate development occurring in the interim that may prevent highway schemes being delivered.

¹³ Mid Sussex District Council. (2018). *Mid Sussex District Plan 2014-2031*. p.8.

¹⁴ West Sussex County Council. (2011). *West Sussex Transport Plan 2011-2026*.

¹⁵ Mid Sussex District Council (2020). *Mid Sussex Transport Study - Transport Impacts Scenarios Reports*.

- 3.15 To support the delivery of strategic highway and sustainable transport infrastructure, land will be identified for safeguarding in accordance with **SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements** for the following schemes, subject to further detailed work. This approach will ensure the long-term delivery of these schemes is not prejudiced whilst more detailed feasibility work is undertaken in partnership with West Sussex County Council, relevant neighbouring authorities and other key stakeholders.
- upgrades to the A23 Junction at Hickstead to increase the capacity of this junction in the longer-term, which could include extending the slip roads, particularly for accessing the A2300.
 - upgrades to the A264 Copthorne Hotel Junction and to the A22 Felbridge, Imberhorne Lane and Lingfield Road Junctions. These upgrades are necessary to increase capacity and improve highway safety within Mid Sussex and support planned growth in Tandridge and are being developed in partnership with West Sussex and Surrey County Councils.
- 3.16 The areas to be safeguarded will be informed by more detailed design and feasibility work, to be carried out in consultation with West Sussex County Council and other relevant parties; this will be subject to further consultation.

SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements

Land will be identified for future safeguarding to support the delivery of the transport schemes listed below*:

- A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions
- A264 Corridor upgrades at Cophorne Hotel Junction
- A23 junction upgrades at Hickstead

If necessary, the Council, working in partnership with West Sussex County Council and relevant neighbouring authorities, will use Compulsory Purchase Powers to enable delivery and bring forward the identified transport schemes, to support delivery of the Site Allocations Development Plan.

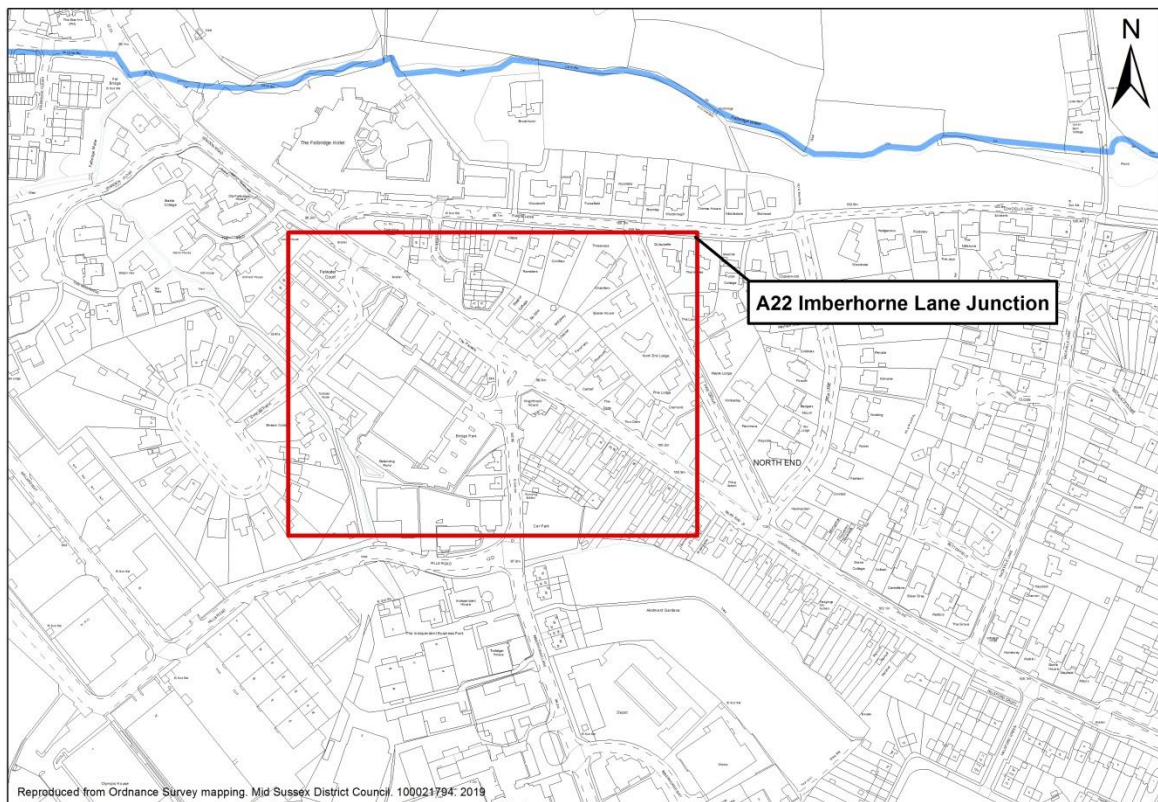
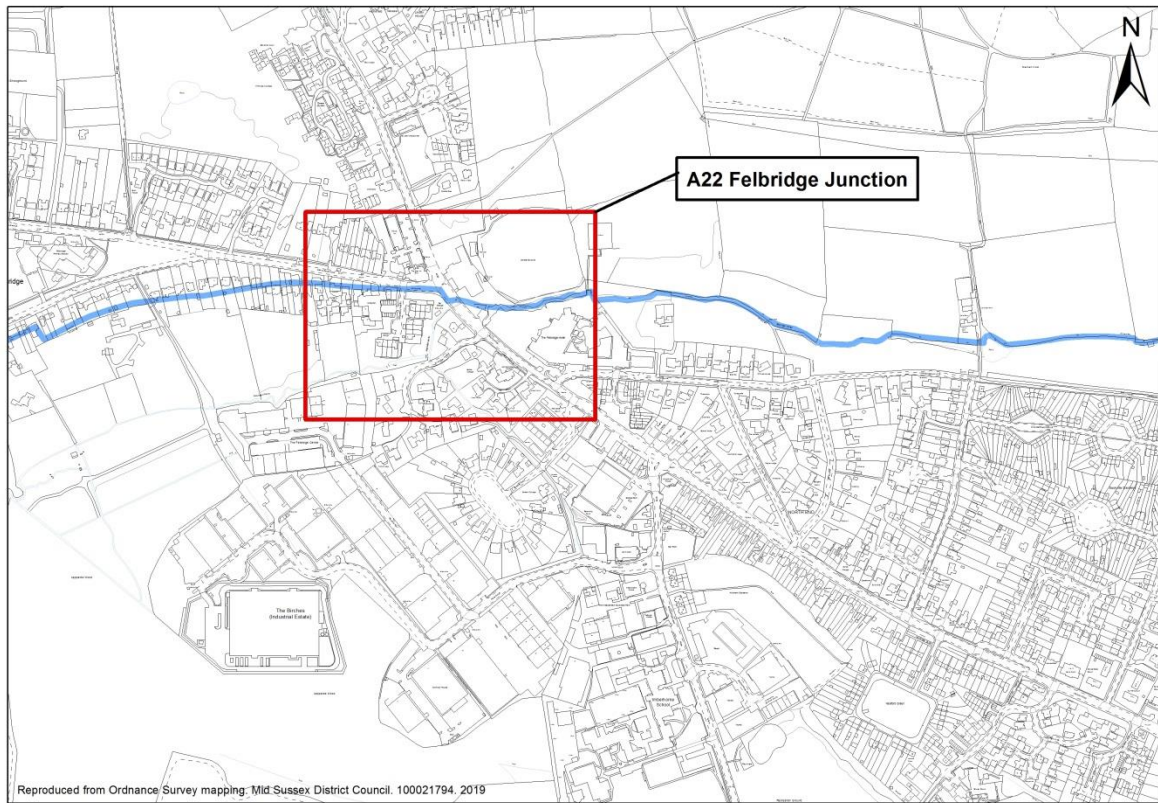
Any proposals for development that may reasonably be considered to impact the delivery of the identified transport schemes, as listed above is required to demonstrate the proposal would not harm their delivery.

Planning permission will not be granted for development that would prejudice the construction or effective operation of the transport schemes listed.

New development in these areas should be carefully designed having regard to matters such as building layout, noise insulation, landscaping, the historic environment and means of access.

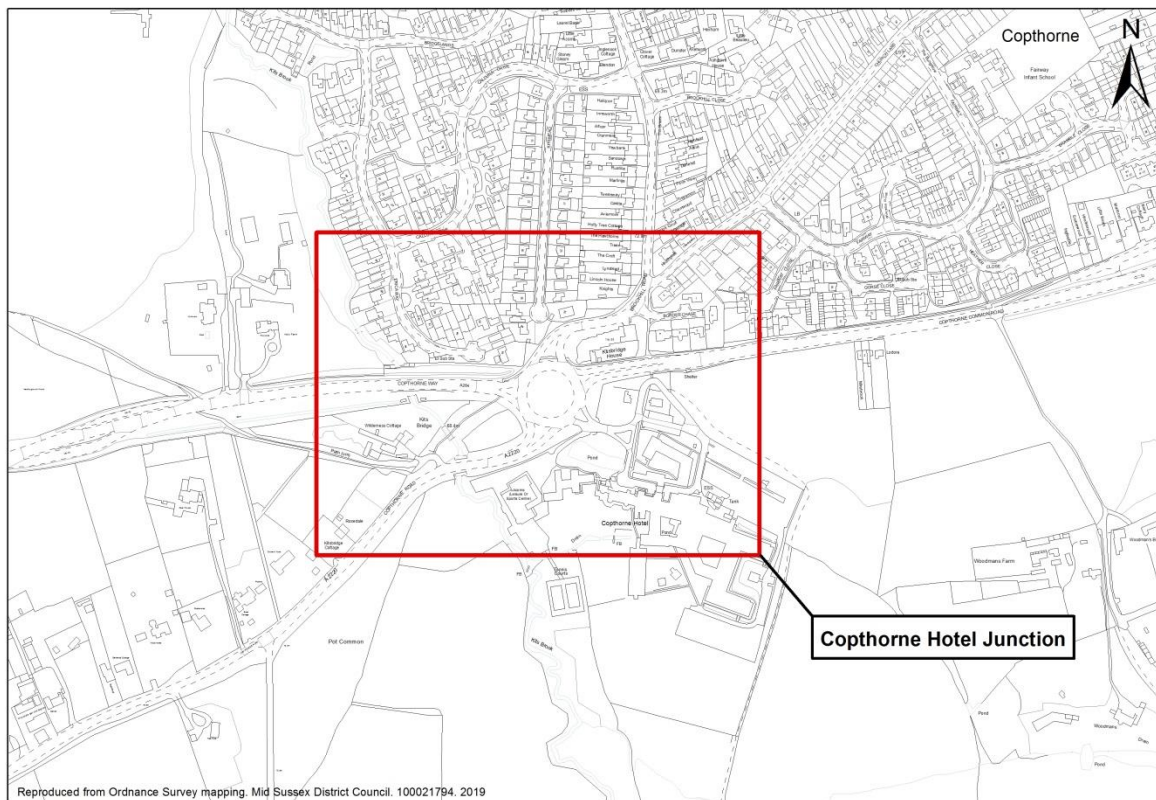
* The areas to be safeguarded will be informed by more detailed design and feasibility work to be carried out in consultation with WSCC and other relevant parties and will be subject to further consultation.

A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions

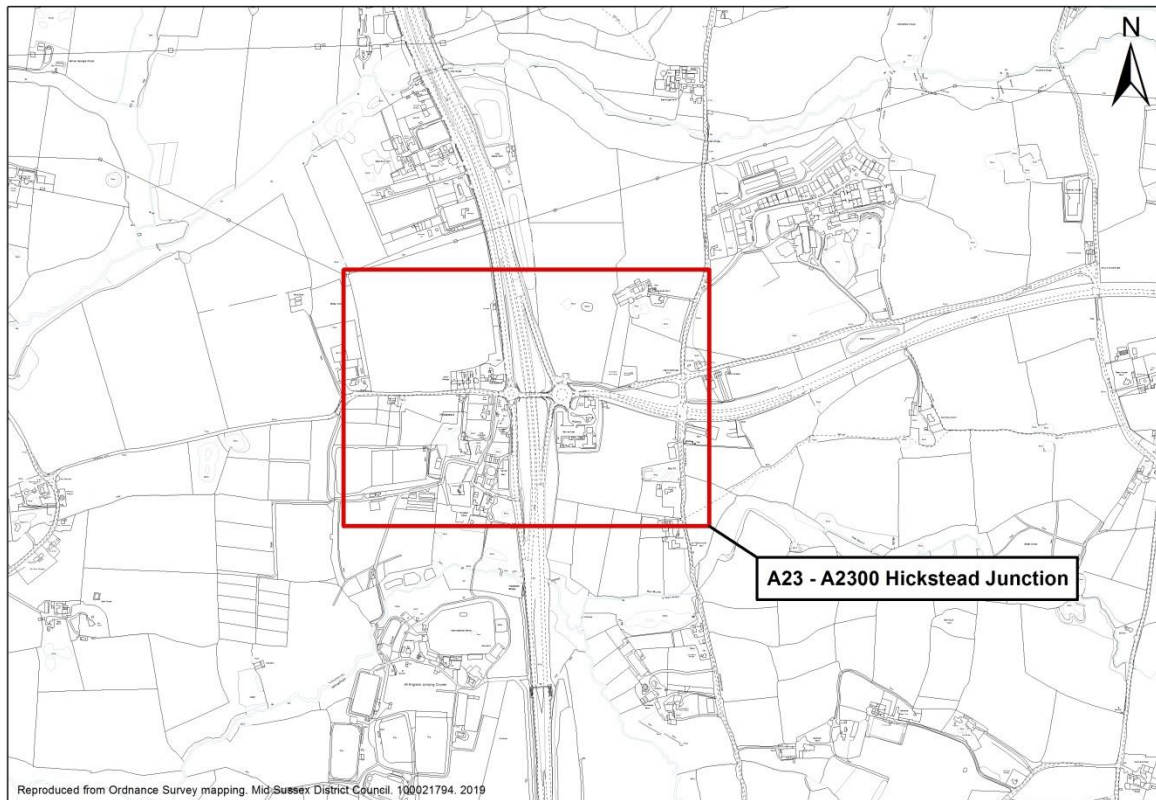




A264 Corridor upgrades at Cophorne Hotel Junction



A23 junction upgrades at Hickstead



Wivelsfield Railway Station

- 3.17 Wivelsfield Railway Station is located on the Brighton Mainline and serves as a public transport hub. This role will significantly increase due to its proximity to the strategic residential and employment allocations to the north and north-west of Burgess Hill and east of Burgess Hill as set out in the District Plan 2014-2031.
- 3.18 The Council has a long-standing ambition to expand and upgrade facilities at Wivelsfield Railway Station to improve the efficiency and effective operation of the station and increase the use of sustainable modes of travel and make it more attractive to users. This ambition includes station platform and ticket office accessibility, station area public realm enhancements; car and cycle parking provision with electric charging points; passenger pick up and drop off points, upgraded bus stop infrastructure; and the provision of cycle links to directly connect with on-going cycle routes to key locations.
- 3.19 Whilst the area in question is identified within the Burgess Hill Neighbourhood Plan as Local Green Space, the proposed enhancements to the station are consistent with the Neighbourhood Plan Policy S2: Wivelsfield Station and Worlds End that supports ‘enhancements to the accessibility of Wivelsfield Station for all users will be encouraged and supported to enhance the sustainability of the town’. Improvements to the station would not be deliverable without using the land in question, which adjoins the existing railway station; it is therefore proposed that the areas covered by Policy SA36 would supersede the LGS designation.
- 3.20 Achieving the ambition will require the use of land located to the west of the station. Land to the west of Wivelsfield Railway Station is therefore safeguarded to support the delivery of a package of improvements in accordance with **SA36: Wivelsfield Railway Station**. This approach ensures that multi-phased delivery of the scheme is not prejudiced.
- 3.21 It is important to note that any areas safeguarded are indicative and will be subject to detailed design work.

SA36: Wivelsfield Railway Station

The Council continues to support the expansion and upgrade of Wivelsfield Railway station and will work with others to ensure opportunities to deliver a package of improvements are prioritised and maximised.

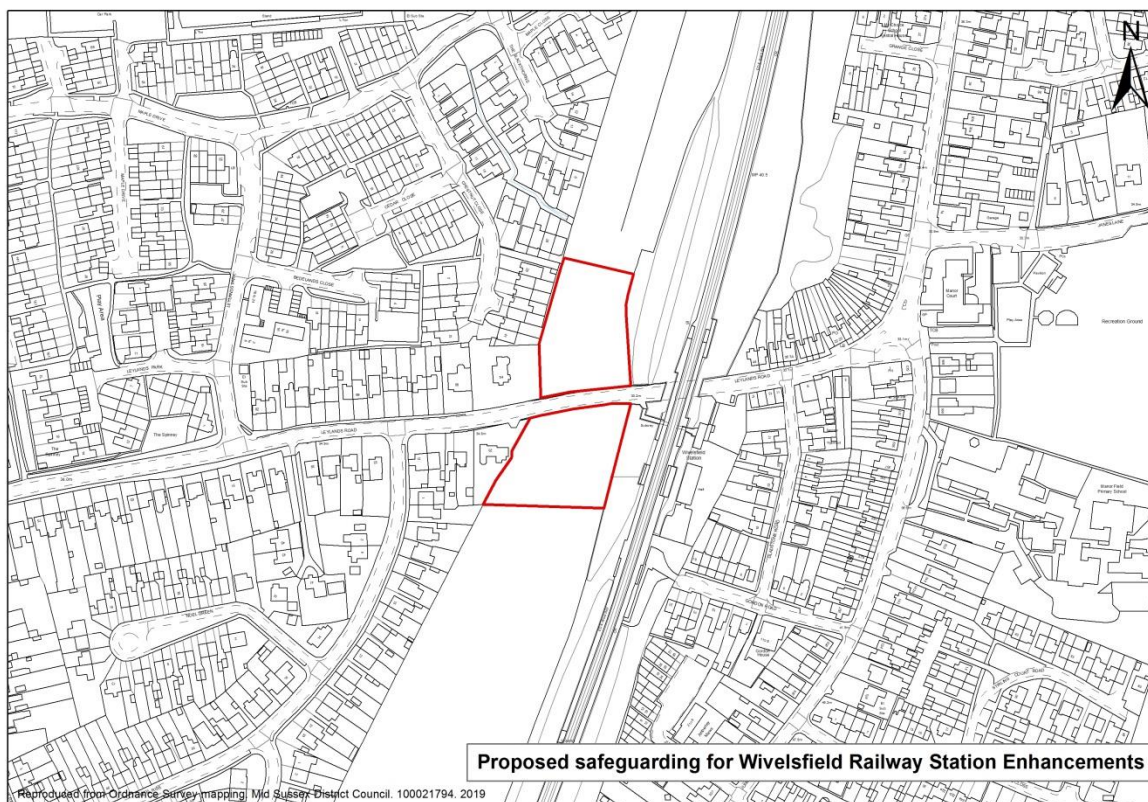
Land to the west of Wivelsfield Railway Station is safeguarded to support the delivery of a package of improvements to expand and upgrade Wivelsfield Railway Station.

The area identified on the Policies Map illustrates where **SA36** will apply; the precise alignment for the scheme, will be informed by detailed design work.

Any proposals for development that may reasonably be considered to impact upon the delivery of the station expansion and upgrade (as shown on the Policies Map) will be required to demonstrate the proposal would not harm delivery of the scheme.

Planning permission will not be granted for development that would prejudice the delivery or effective operation of the expansion and upgrade to Wivelsfield Station.

If necessary, the Council, working in partnership with West Sussex County Council, will use Compulsory Purchase Powers to enable delivery and bring forward the identified transport schemes, to support delivery of the Development Plan.



Burgess Hill to Haywards Heath Multifunctional Network

- 3.22 The Council is committed to delivering an ambitious programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill as set out in the District Plan 2014-2031.
- 3.23 Despite Burgess Hill and Haywards Heath being less than three miles apart, there is no realistic traffic free means of travelling between the two towns. Delivering a strategic multifunctional (walking/cycling/equestrian) network between Burgess Hill and Haywards Heath would have multiple benefits including the potential to promote road safety by taking such uses away from the road highway; provide commuting alternatives and support local businesses, reduce the use of the private car and tackle congestion, promote social mobility and cohesion and support healthy lifestyles.
- 3.24 Work has progressed to bring forward a package of sustainable transport infrastructure improvements to Burgess Hill. This has identified the potential for a dedicated multifunctional network between Burgess Hill and Haywards Heath.
- 3.25 A number of route options are being investigated to the east and west of the Brighton main railway line and these include, for example, opportunities to connect strategic development to the north and north west of Burgess Hill, including a new secondary school to be developed, and with Haywards Heath that is away from the road highway.
- 3.26 To support the delivery of the Burgess Hill/ Haywards Heath Multifunctional Network, land is therefore safeguarded in accordance with **SA37: Burgess Hill/ Haywards Heath Multifunctional Network**. This approach ensures that multi-phased delivery of the scheme is not prejudiced.
- 3.27 It is important to note that any areas safeguarded are indicative and will be subject to detailed design work. In addition, the Council does not consider the use of Compulsory Purchase of private property appropriate to facilitate any route.

SA37: Burgess Hill/ Haywards Heath Multifunctional Network

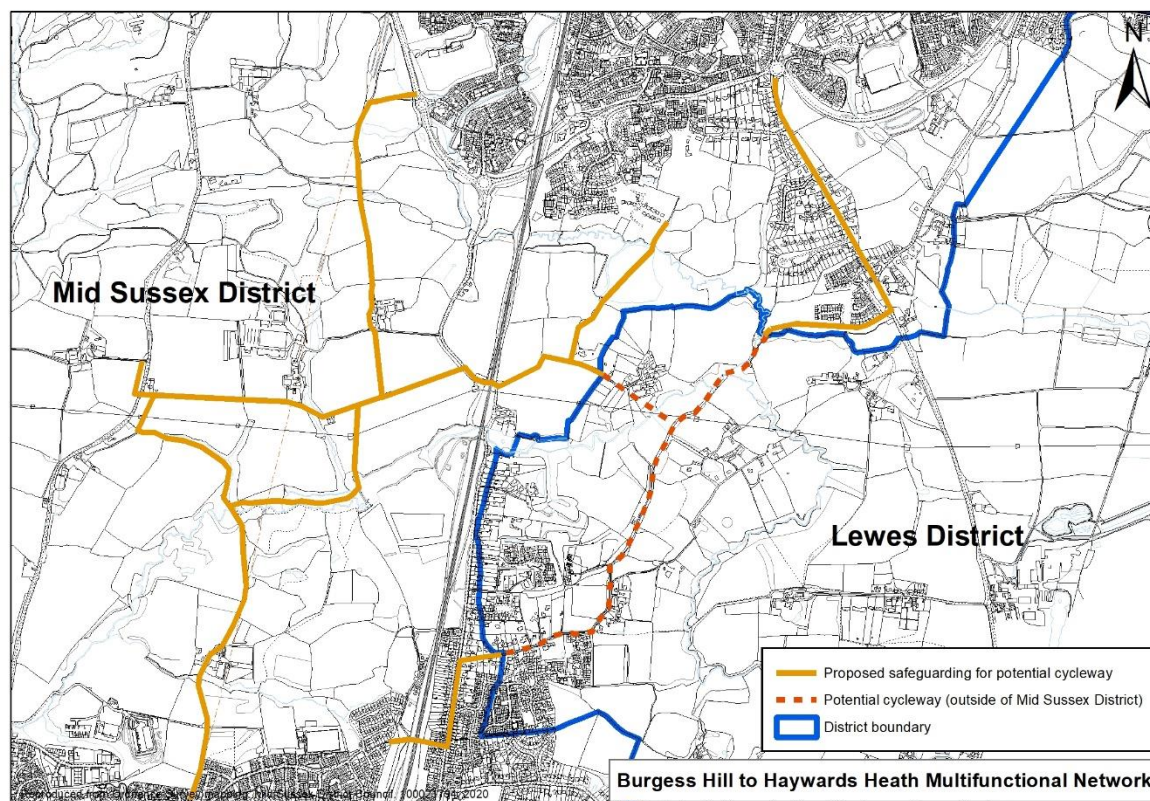
The Council continues to support the delivery of a dedicated multifunctional network, within the lifetime of this plan and will work with key stakeholders to ensure opportunities to deliver the scheme are prioritised and maximised.

Land is safeguarded to support the delivery of the Burgess Hill/ Haywards Heath multifunctional network.

The area shown on the Policies Map illustrates where **SA37** will apply; the precise alignment for the scheme will be informed by detailed design work.

Any proposals for development that may reasonably be considered to impact the delivery of the multifunctional network (as shown on the Policies Map) will be required to demonstrate the proposal would not harm delivery of the scheme.

Planning permission will not be granted for development that would prejudice the delivery or effective operation of the proposed multifunctional network.



Air Quality

- 3.28 National planning policy is clear on the importance of taking into account the potential impacts on air quality when assessing development proposals. In particular, national policy identifies the importance of preventing new and existing development from either contributing to or being put at unacceptable risk from pollution and that new development is appropriate taking into account any likely effects.¹⁶
- 3.29 Furthermore, legislative¹⁷ limits are set for concentrations of major air pollutants that may impact on public health, amenity and local biodiversity, such as airborne particulate matter and nitrogen dioxide.
- 3.30 Air quality within Mid Sussex District is predominantly good and there is only one currently known location where air pollution exceeds the levels set by European and UK regulations. For this reason, the Council has declared one Air Quality Management Area (AQMA) that relates to elevated levels of nitrogen dioxide (NO₂) at Stonepound Crossroads, Hassocks.
- 3.31 Development proposals located in proximity to an AQMA will need to assess the impact on air quality and have regard to the Council's Air Quality Action Plan¹⁸.

¹⁶ *National Planning Policy Framework (NPPF)*. (2019). para. 181.

¹⁷ *The Air Quality Standards Regulations 2010*

¹⁸ Mid Sussex District Council. (2018). *Air Quality Action Plan*.

- 3.32 Any development that is likely to generate traffic will need to assess its impact on air quality. The level of assessment will be based on the proposed development's proximity to an AQMA and the amount of increase in traffic for human health protection and potential impact on protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Sites of Special Scientific Interest (SSSIs).
- 3.33 Proposals will also be considered in accordance with **SA38: Air Quality** that replaces District Plan Policy DP29 in relation to air quality. Early engagement with the Council's air quality officer is encouraged to help ensure the approach taken is acceptable.
- 3.34 It is likely that a detailed Air Quality Assessment will be required, where proposals are of a large scale and/ or likely to have a significant or cumulative impact upon air quality, particularly where development is located in, or within relevant proximity, to an AQMA. The level of assessment will depend on the nature, extent and location of the development. Besides a development-related traffic emissions assessment, a dust construction assessment may also be required.
- 3.35 Any air quality assessments and other related work should be undertaken by a competent person/ company¹⁹ in line with best practice and the Air Quality and Emissions Mitigation Guidance for Sussex 2019²⁰, or its replacements. This guidance requires that appropriate levels of mitigation are detailed to reduce air quality impacts.
- 3.36 Increased traffic emissions as a consequence of new development may result in atmospheric pollution on the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)²¹. The main impacts of interest are acid deposition and eutrophication by nitrogen deposition, as well as NO_x concentrations. High levels of nitrogen may detrimentally affect the composition of an ecosystem and lead to loss of species, whilst high levels of NO_x concentrations may lead to leaf damages and reduced growth. The District Council has undertaken a Habitats Regulations Assessment of the implications of the Site Allocations DPD for the Ashdown Forest SPA and SAC in view of that protected site's conservation objectives and to ensure no significant adverse effect on the integrity of the Ashdown Forest SPA and SAC. However, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), development proposals will need to consider any potential impacts, including in combination with other development. Additional information may need to be provided by the applicant for the purposes of undertaking a Habitats Regulations Assessment in accordance with SA38 and **DP 17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)**.

¹⁹ Such as holding membership of the Institute for Air Quality Management.

²⁰ *Air Quality and Emissions Mitigation Guidance for Sussex Authorities*. (2019).

²¹ This may also apply to other protected sites (SPA, SAC, Ramsar and SSSI) within 200m from roads where significant increased traffic emissions are expected.

SA38: Air Quality

The Council will require applicants to demonstrate that there is not unacceptable impact on air quality. The development should minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development, either through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.

Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council's current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2019 or as updated)) an air quality assessment will be required.

Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMAs), will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.

Mitigation measures will need to demonstrate how the proposal would make a positive contribution towards the aims of the Council's Air Quality Action Plan and be consistent with the Council's current guidance as stated above.

Mitigation measures will be secured either through a negotiation on a scheme, or via the use of planning condition and/ or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.

In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to result in increased traffic may be expected to demonstrate how any air quality impacts, including in combination impacts, have been considered in relation to the Ashdown Forest SAC. Any development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate for any potential adverse effects.

4. Implementing the Plan

- 4.1 One of the key tests of an effective development plan is that it is deliverable. The Council has a range of mechanisms which it can use to ensure the Site Allocations DPD objectives and policies are effective, including partnership working with landowners, developers and strategic stakeholders, and use of its own powers, land and assets.
- 4.2 In line with the NPPF and in order to foster sustainable development the Council has a positive approach to decision taking over planning applications which accord with the development plan.
- 4.3 However, it recognises that there are many factors that can influence the timely development of sites including land assembly, changes in ownership, changes in the economy and speed of delivery of required infrastructure. In order to address these risks and maintain a rolling 5-year housing land supply the Council will:
- continue to closely monitor the commitment and completion of sites;
 - continue to work closely with developers, landowners and promoters of sites to ensure delivery within agreed timescales;
 - work with Town and Parish Councils to bring forward Neighbourhood Plan allocations in line with District Plan policies DP4: Housing and DP6: Settlement Hierarchy and support further Neighbourhood Plan preparation;
 - continue working with a Developers' Liaison Group in order to understand issues regarding site supply and development constraints; and
 - prepare, maintain and publish and update regularly a Brownfield Sites Register.
- 4.4 The Council has worked in partnership with a range of strategic organisations (including the Coast to Capital LEP; the Gatwick Diamond Initiative; and the West Sussex and Greater Brighton Strategic Planning Board) to make sure that sub-regional issues are addressed.

Monitoring of the Site Allocations DPD

- 4.5 Monitoring is an essential component of the plan-making process. The purpose of monitoring is to assess whether the policies of the documents produced as part of the Development Plan are achieving the objectives and intended policy outcomes, whether they are having any unintended consequences and whether they are still relevant or require a review. It is important that there are mechanisms in place for the Council to identify changing circumstances and take appropriate action if required.
- 4.6 The Mid Sussex District Plan 2014-2031 sets out a comprehensive Spatial Strategy and Strategic Policies that shapes the pattern, amount and type of future development in the District. These policies are subject to their own monitoring framework, in Chapter 5 of the District Plan. As a supplementary document to the District Plan, the additional allocations and policies in the Site Allocations DPD complement the Spatial Strategy and Strategic Policies set out in the District Plan. Therefore, monitoring of the Site Allocations DPD will also build upon the monitoring framework established in the District Plan.
- 4.7 The monitoring framework (**Appendix B**) sets out a range of indicators that assess the impact of policies in the Site Allocations DPD. It is important that the indicators chosen can be monitored in a robust and consistent way. The indicators are reported through the Council's monitoring information and will be made available as soon as

possible. If it appears that policies are not being effective or are no longer appropriate in the light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

APPENDICES

Appendix A: Existing Employment Sites

Appendix B: Monitoring Framework

Glossary

Appendix A: Existing Employment Sites

Albourne Court, Henfield Road, Albourne

SHELAA: 861	Settlement: Albourne	Gross Site Area (ha): 0.6
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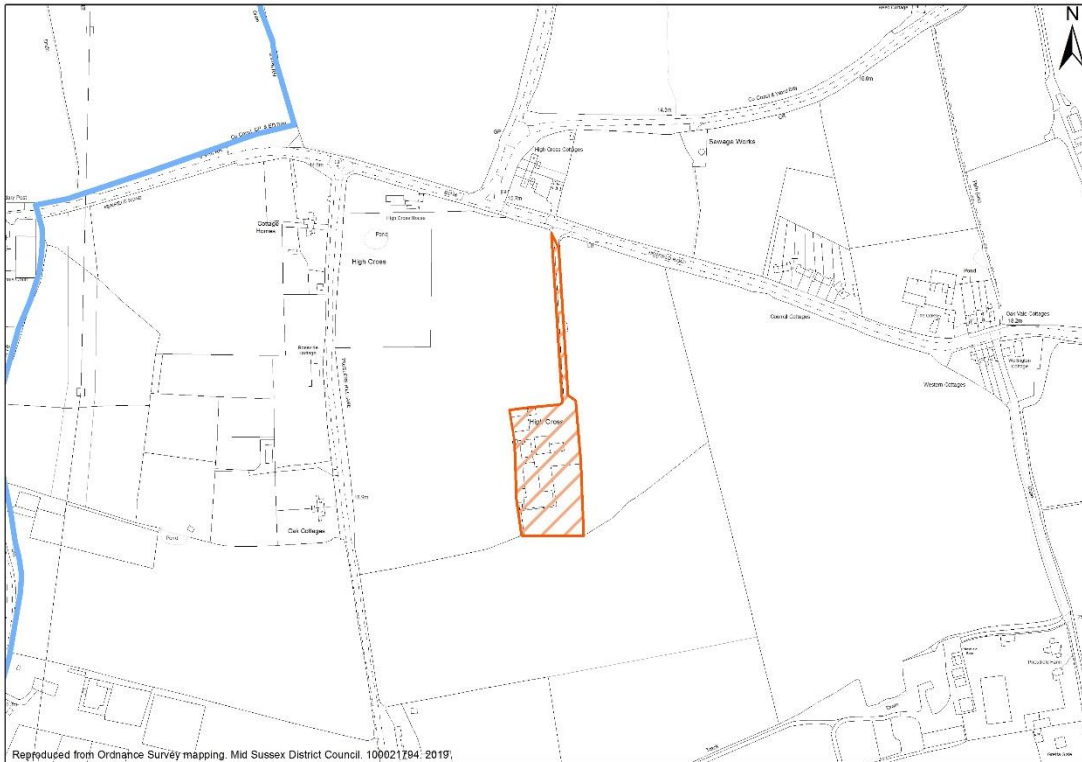
Box House Poultry Farm, Albourne Road

SHELAA: 859	Settlement: Albourne	Gross Site Area (ha): 0.68
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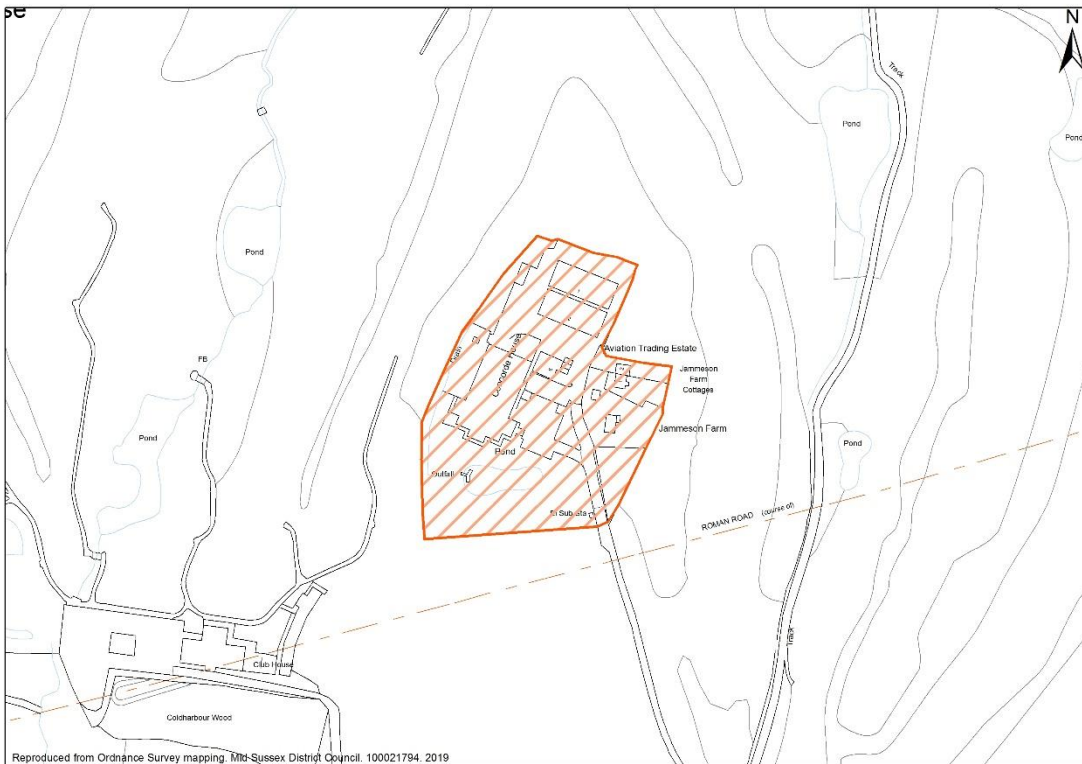
High Cross Farm, Henfield Road, Albourne

SHELAA: 860	Settlement: Albourne	Gross Site Area (ha): 0.7
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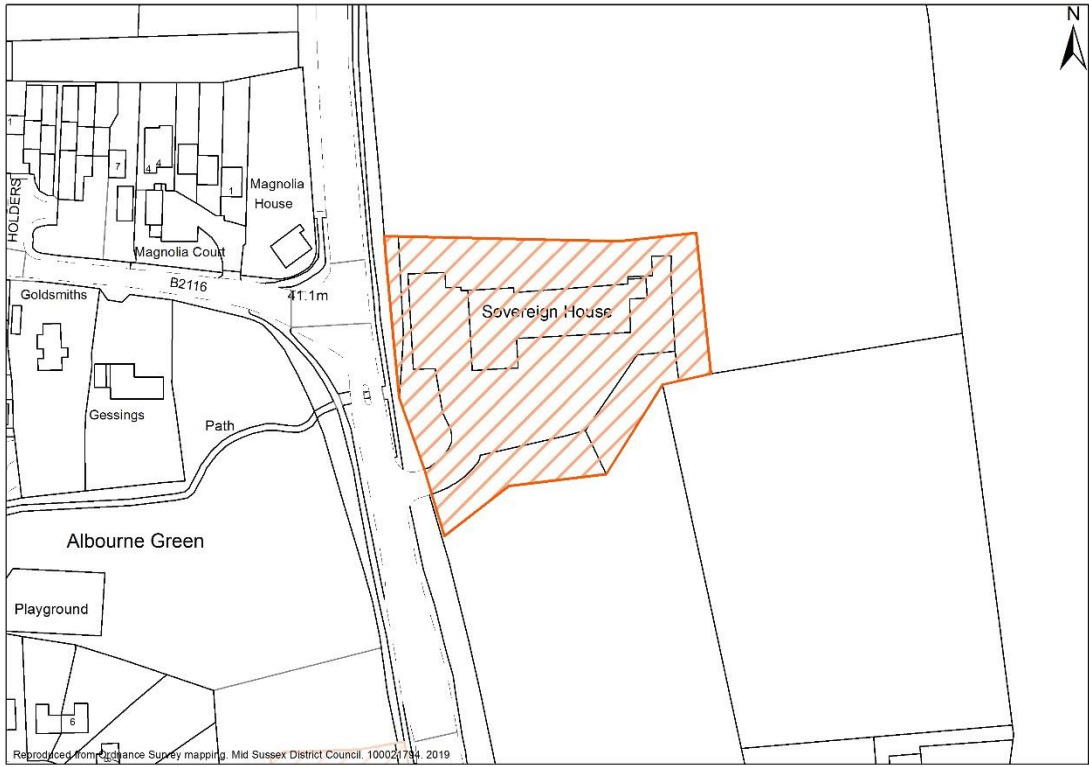
Jammeson's Farm, Muddleswood Road, Albourne

SHELAA: 941	Settlement: Albourne	Gross Site Area (ha): 1.8
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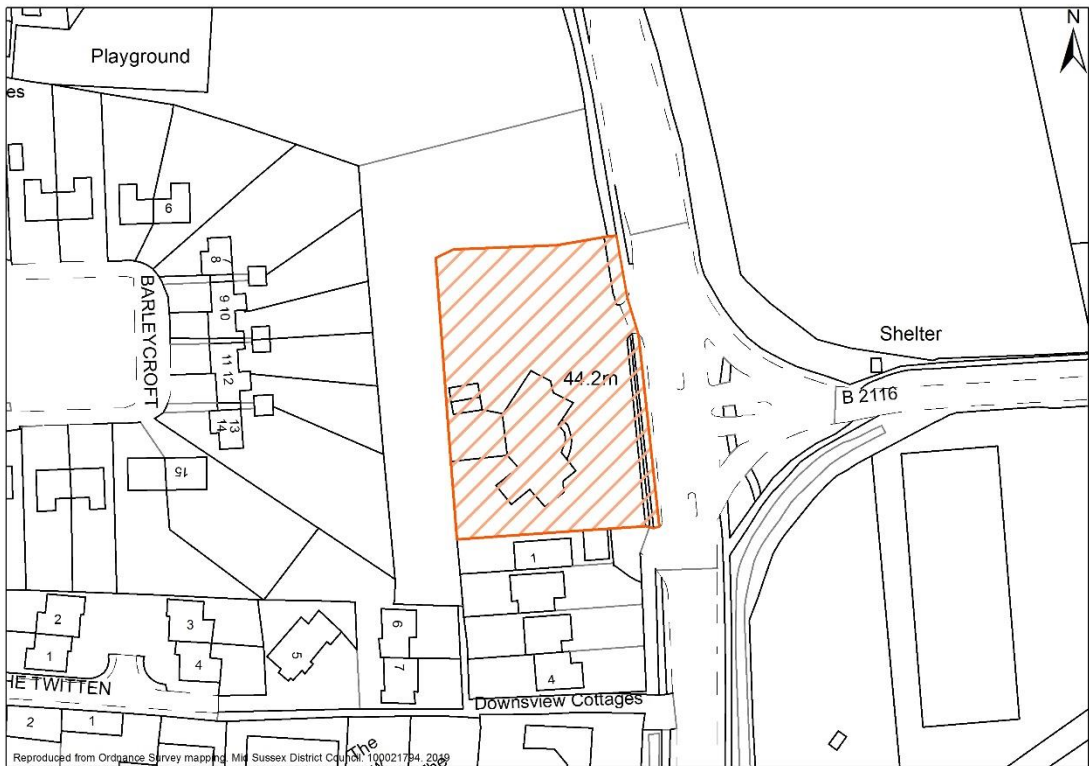
Sovereign House, London Road, Albourne

SHELAA: 942 Settlement: Albourne Gross Site Area (ha): 0.7



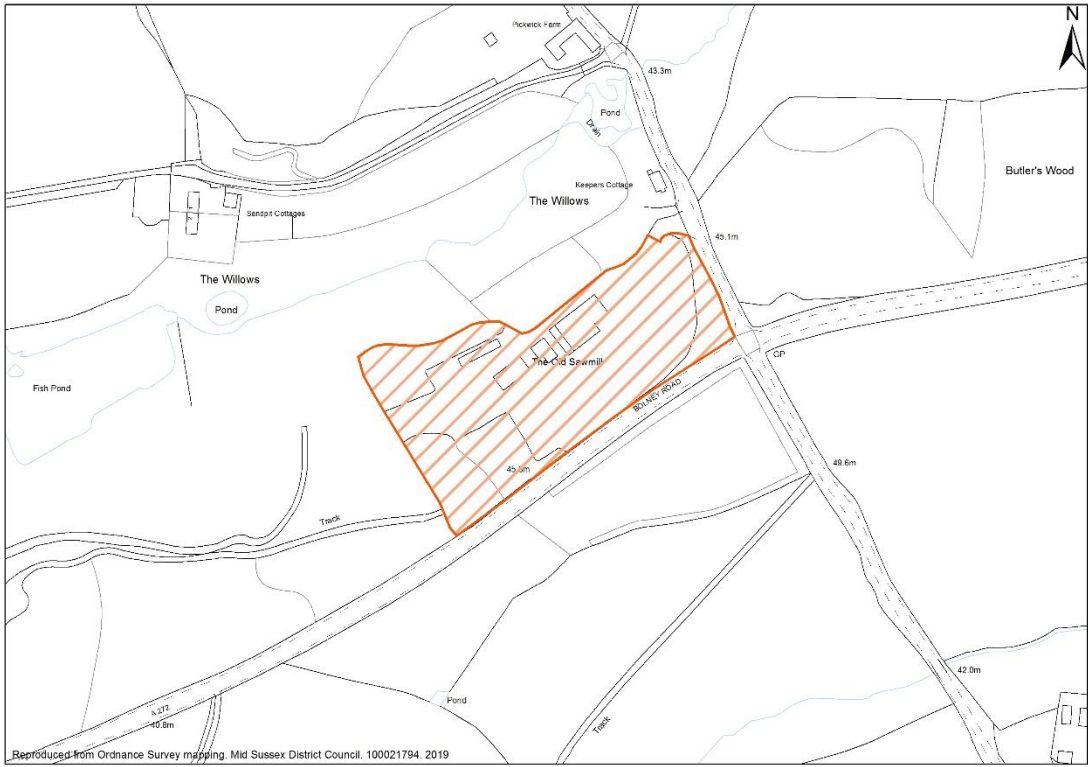
Softech House, London Road, Albourne

SHELAA: 943 Settlement: Albourne Gross Site Area (ha): 0.3



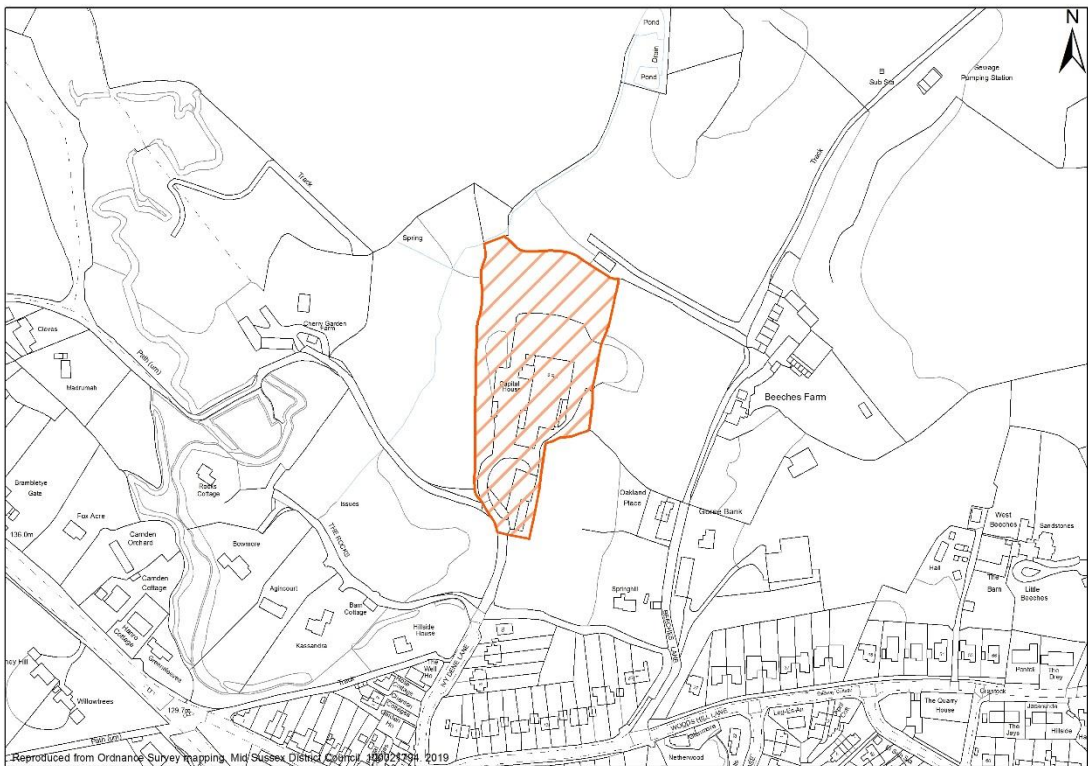
The Old Sawmill, Pickwell Lane, Ansty

SHELAA: 934 Settlement: Ansty Gross Site Area (ha): 1.5



Ivy Dene Industrial Estate, Ivy Dene Lane, Ashurst Wood

SHELAA: 182 Settlement: Ashurst Wood Gross Site Area (ha): 1.1



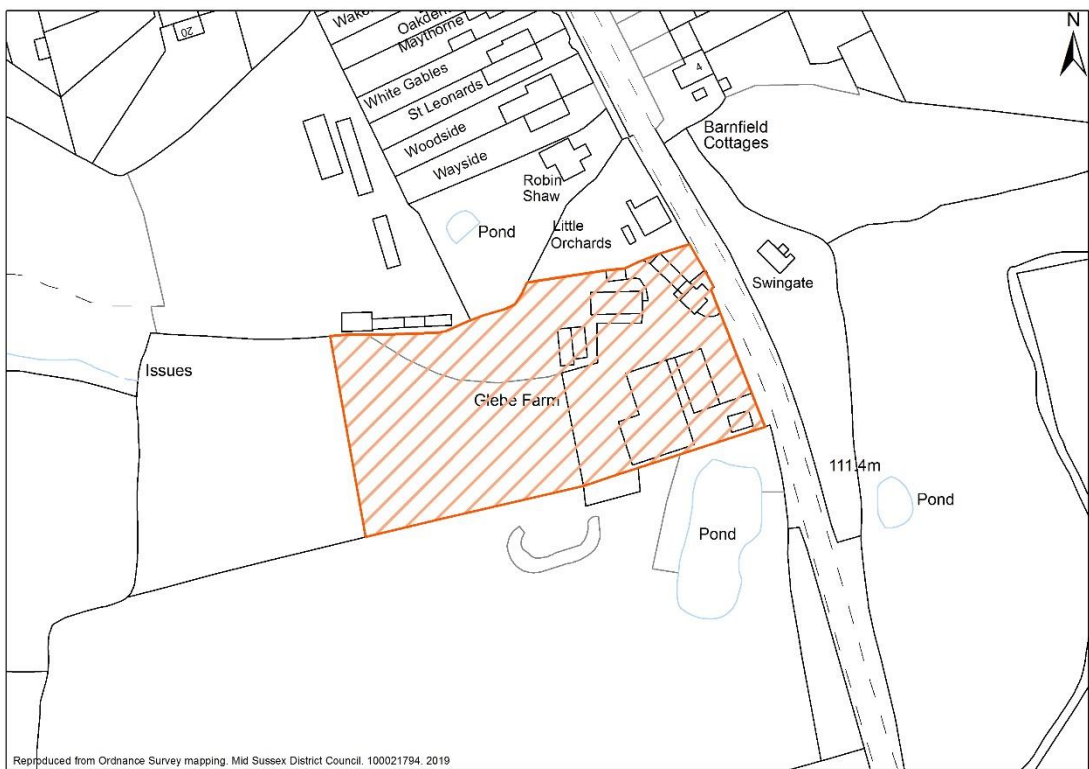
Balcombe Saw Mills, Haywards Heath Road, Balcombe

SHELAA: 936 **Settlement:** Balcombe **Gross Site Area (ha):** 0.7



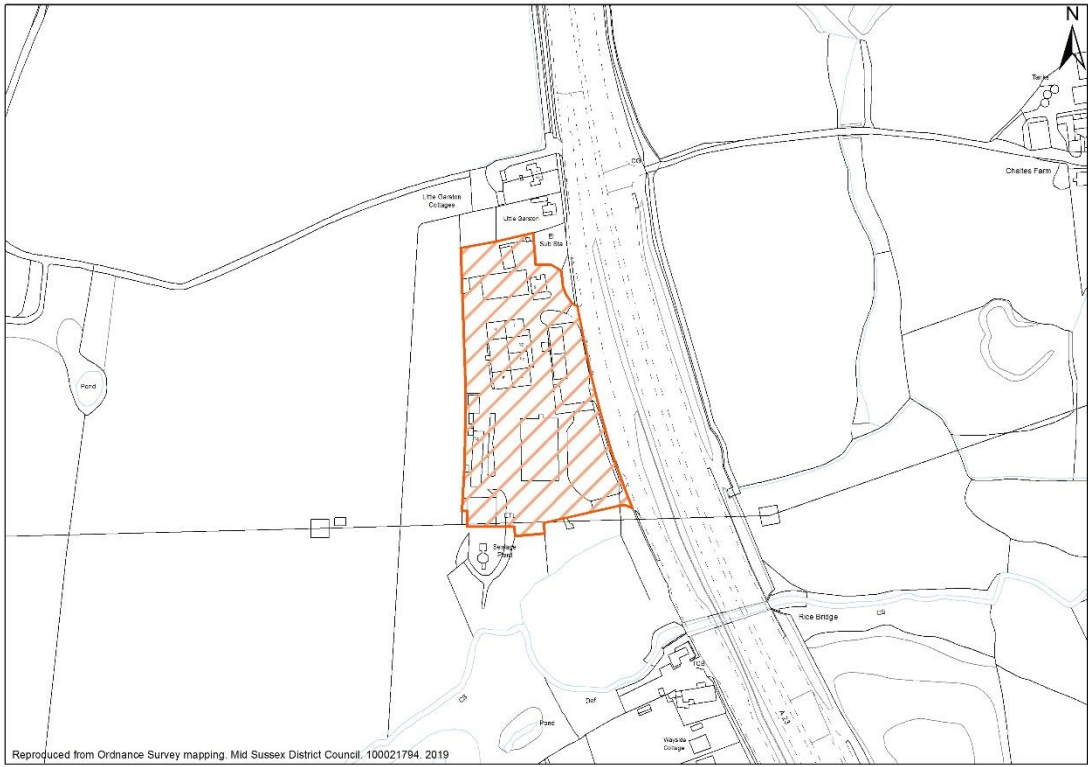
Glebe Farm, Haywards Heath Road, Balcombe

SHELAA: 26 **Settlement:** Balcombe **Gross Site Area (ha):** 0.58



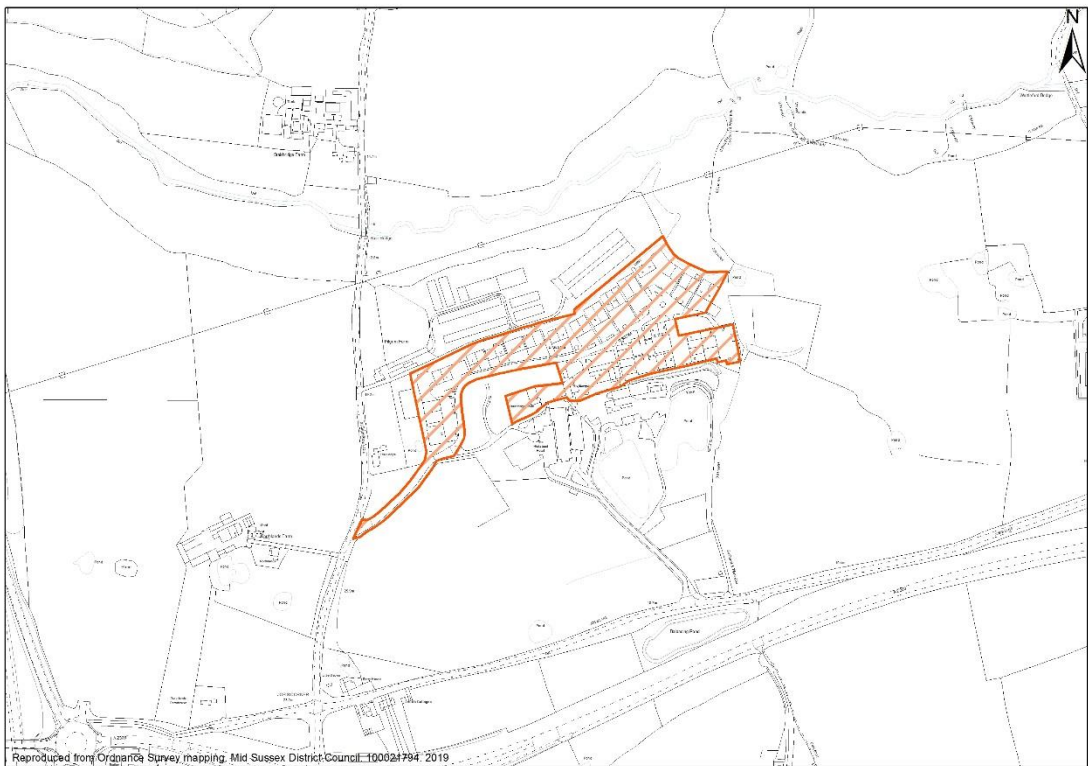
Ricebridge Works, Brighton Road, Bolney

SHELAA: 863 **Settlement:** Bolney **Gross Site Area (ha):** 1.7



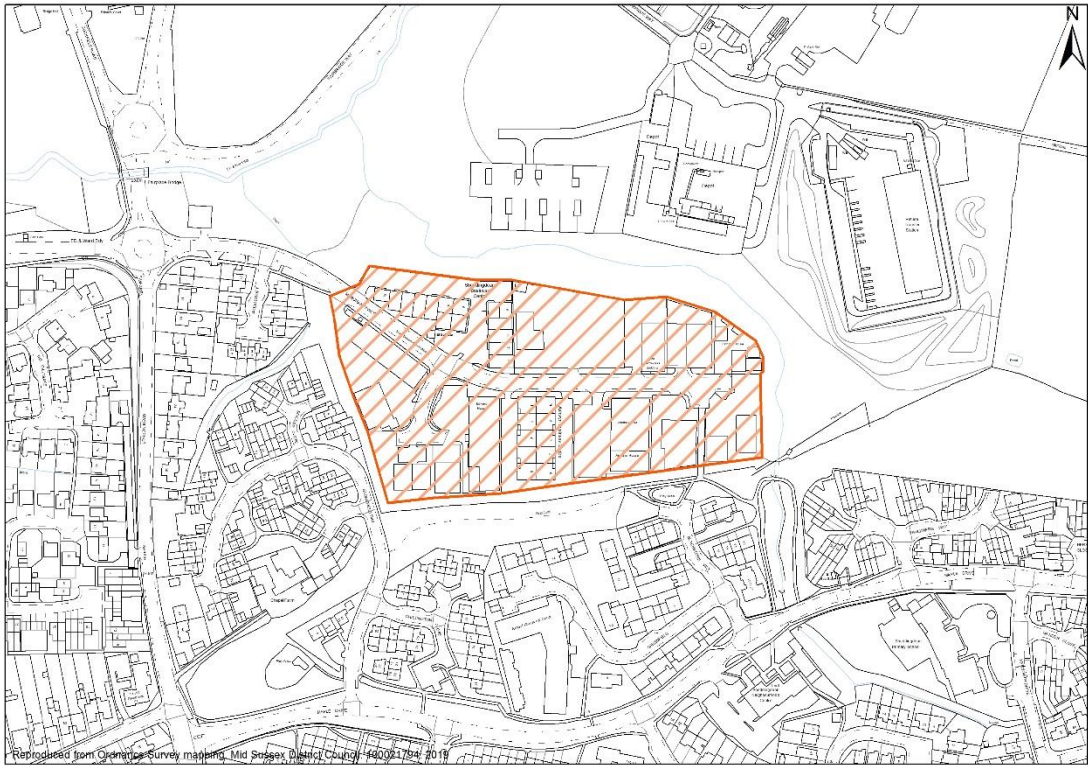
Bolney Grange Business Park

SHELAA: 862 **Settlement:** Bolney **Gross Site Area (ha):** 4.1



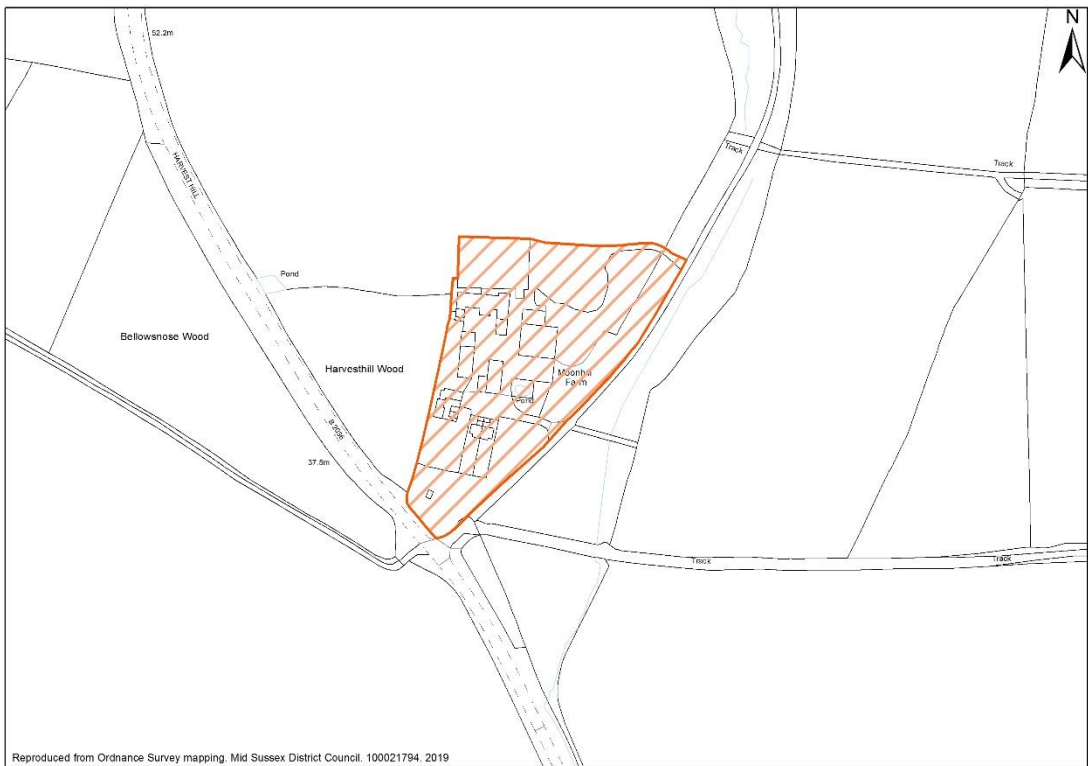
Sheddingdean Business Centre, Marchants Way, Burgess Hill

SHELAA: 909	Settlement: Burgess Hill	Gross Site Area (ha): 3.2
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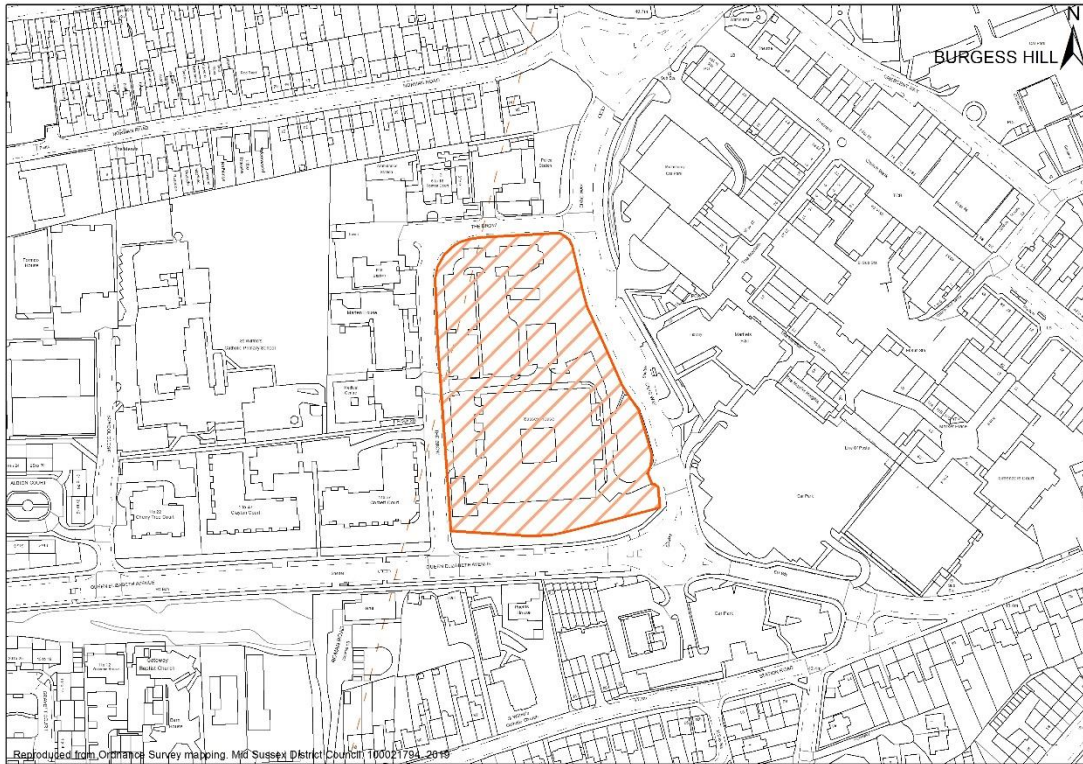
Moonhill Farm, Burgess Hill Road, Ansty

SHELAA: 950	Settlement: Burgess Hill	Gross Site Area (ha): 1.46
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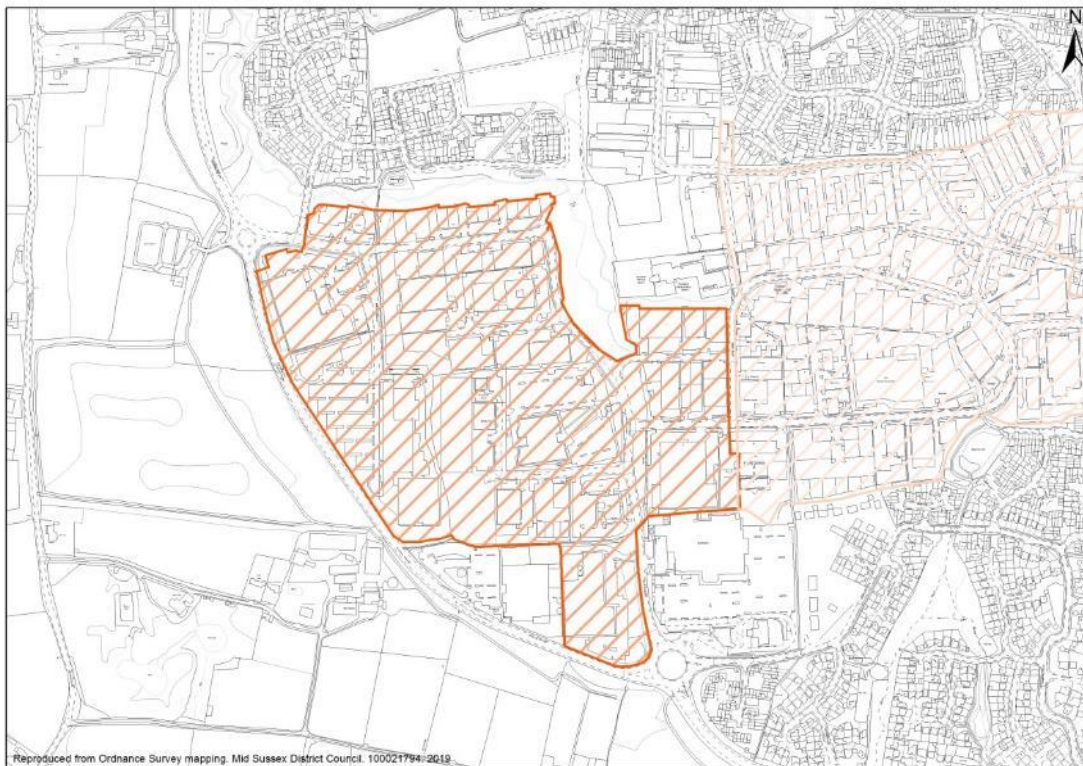
Sussex House, Civic Way, Burgess Hill

SHELAA: 866 **Settlement:** Burgess Hill **Gross Site Area (ha):** 1.6



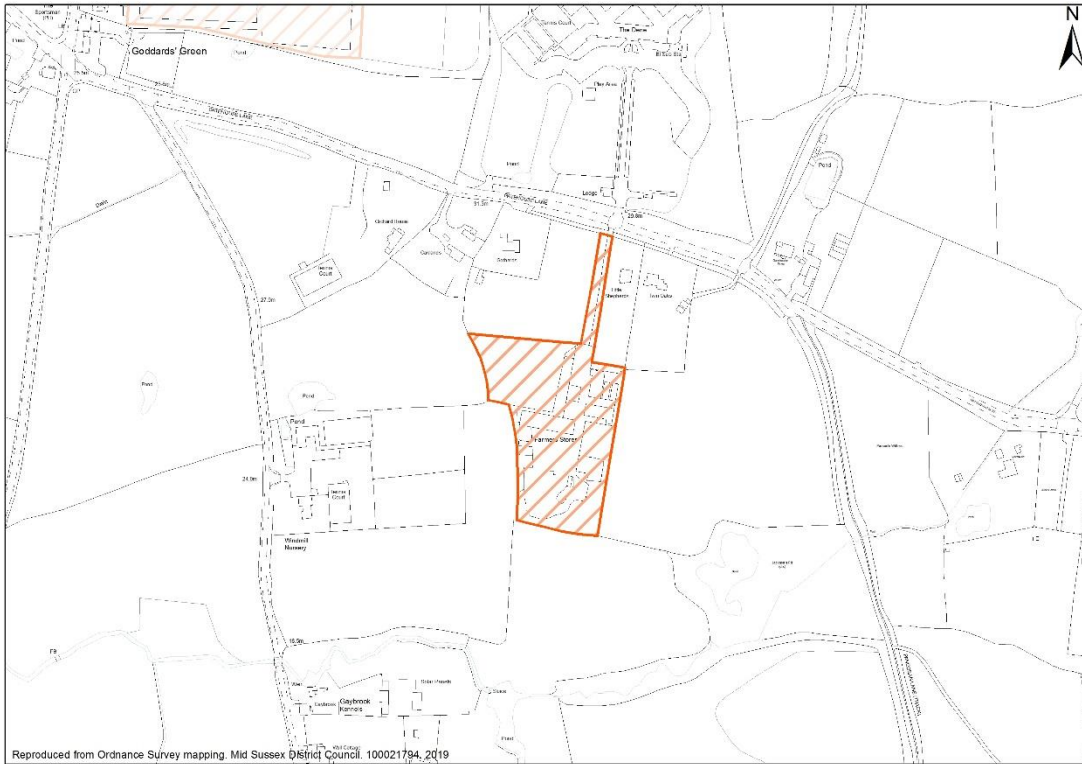
Victoria Business Park west, Edward Way/ Innovation Drive, Burgess Hill

SHELAA: 910 **Settlement:** Burgess Hill **Gross Site Area (ha):** 21.3



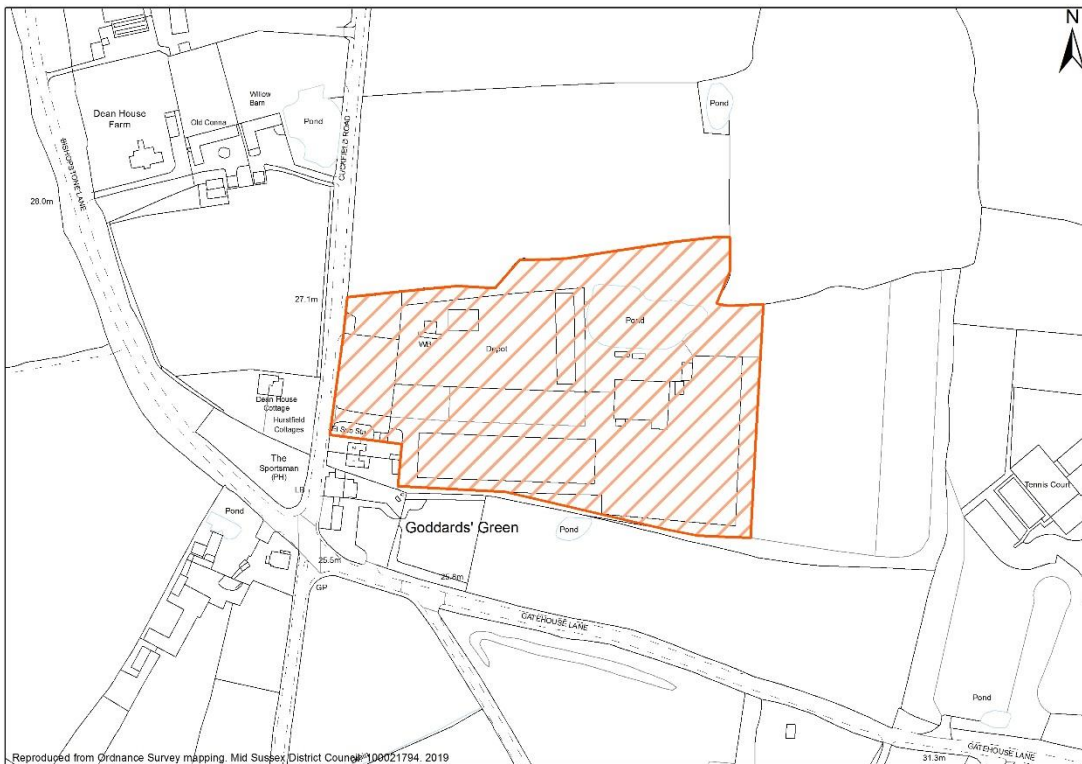
Farmers Stores, Gatehouse Lane, Burgess Hill

SHELAA: 951	Settlement: Burgess Hill	Gross Site Area (ha): 1.04
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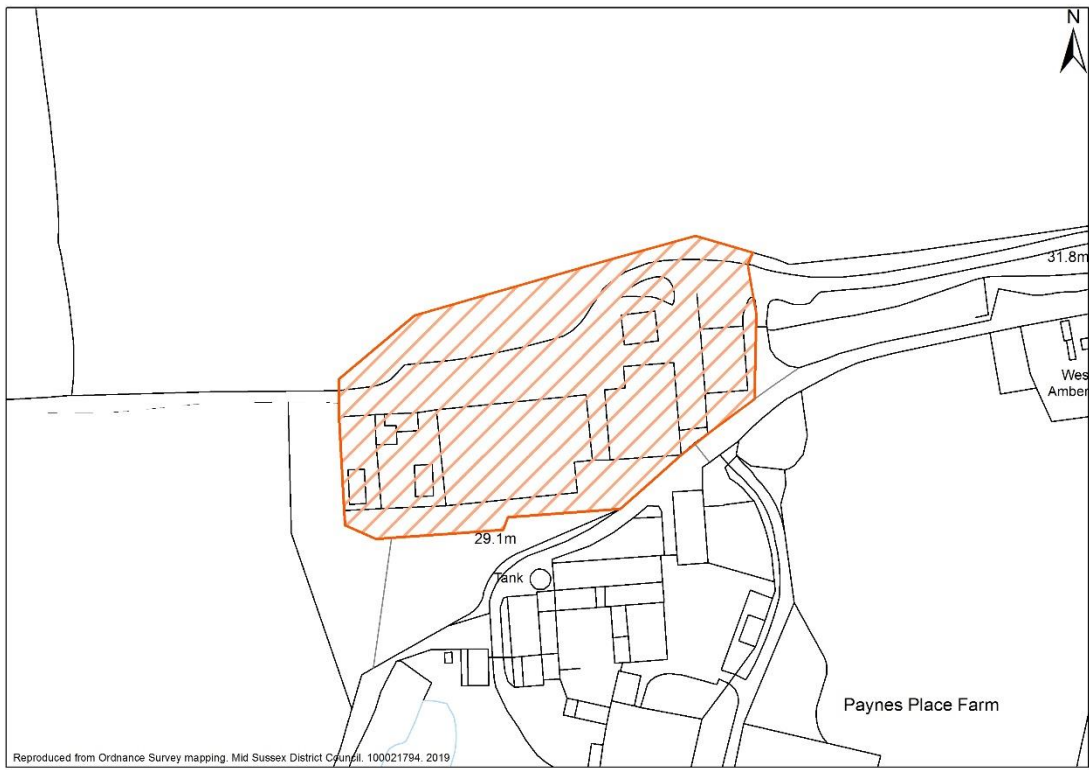
Depot, Cuckfield Road, Goddards Green

SHELAA: 908	Settlement: Burgess Hill	Gross Site Area (ha): 3
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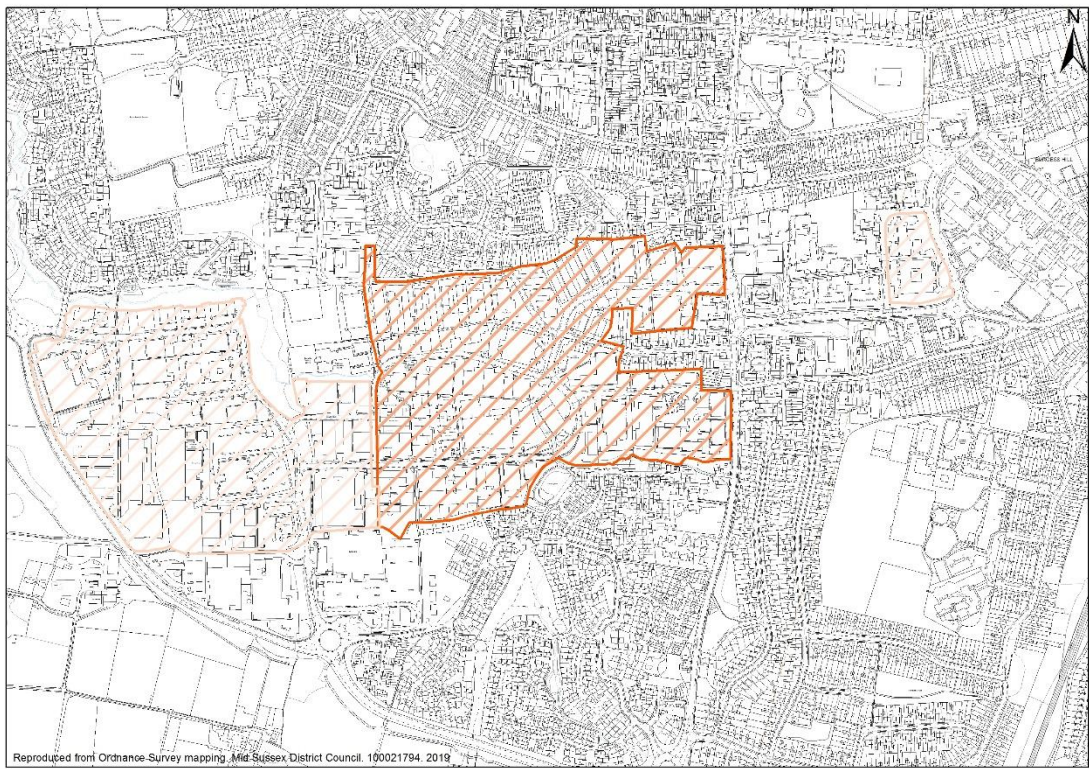
Paynes Place Farm, Burgess Hill

SHELAA: 933 **Settlement:** Burgess Hill **Gross Site Area (ha):** 0.8



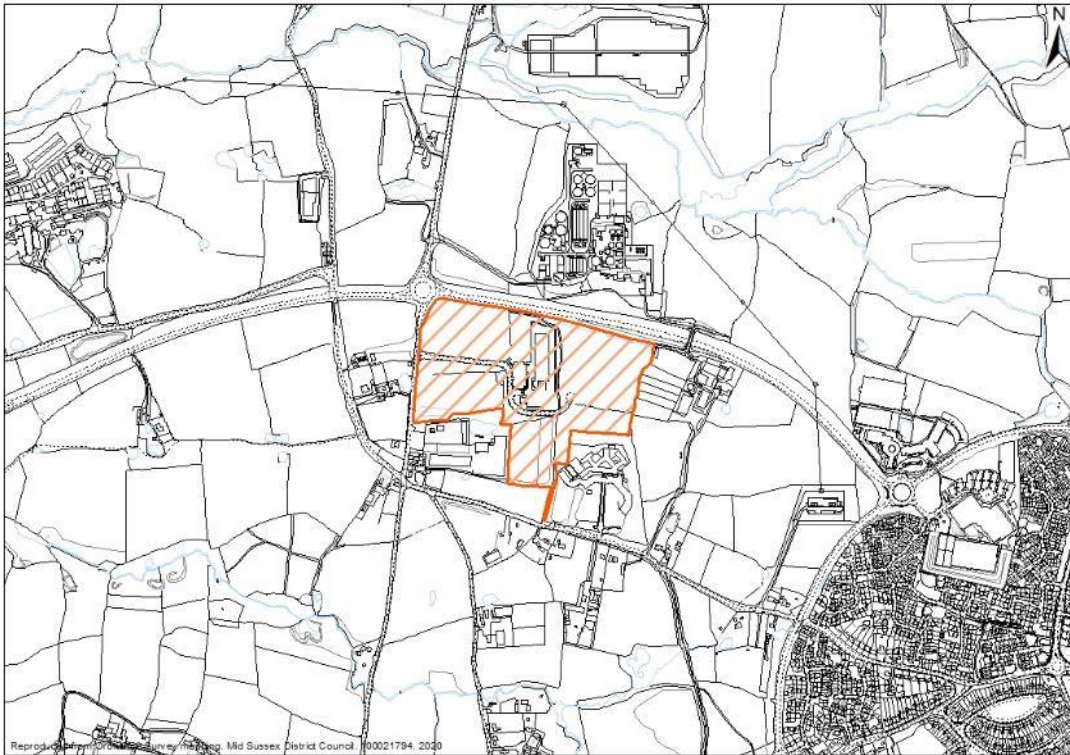
Victoria Business Park East, Consort Way/ Albert Drive, Burgess Hill

SHELAA: 245 **Settlement:** Burgess Hill **Gross Site Area (ha):** 24.4



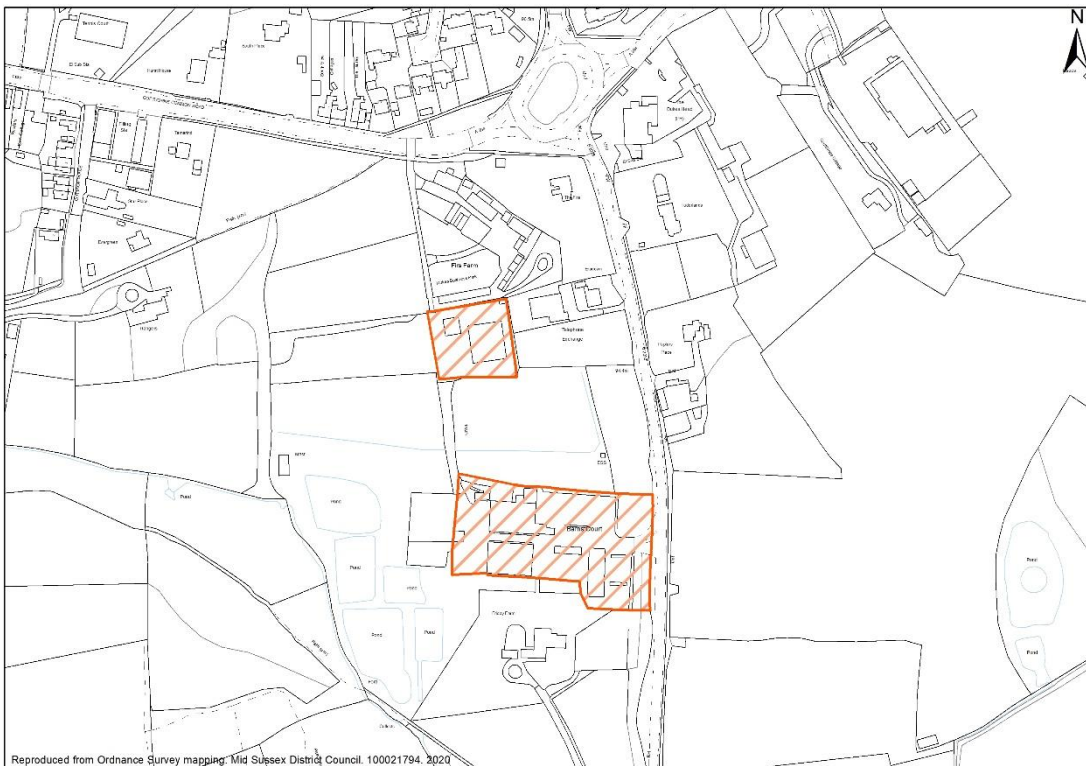
The Hub, Burgess Hill

SHELAA: 74 **Settlement:** Burgess Hill **Gross Site Area (ha):** 14



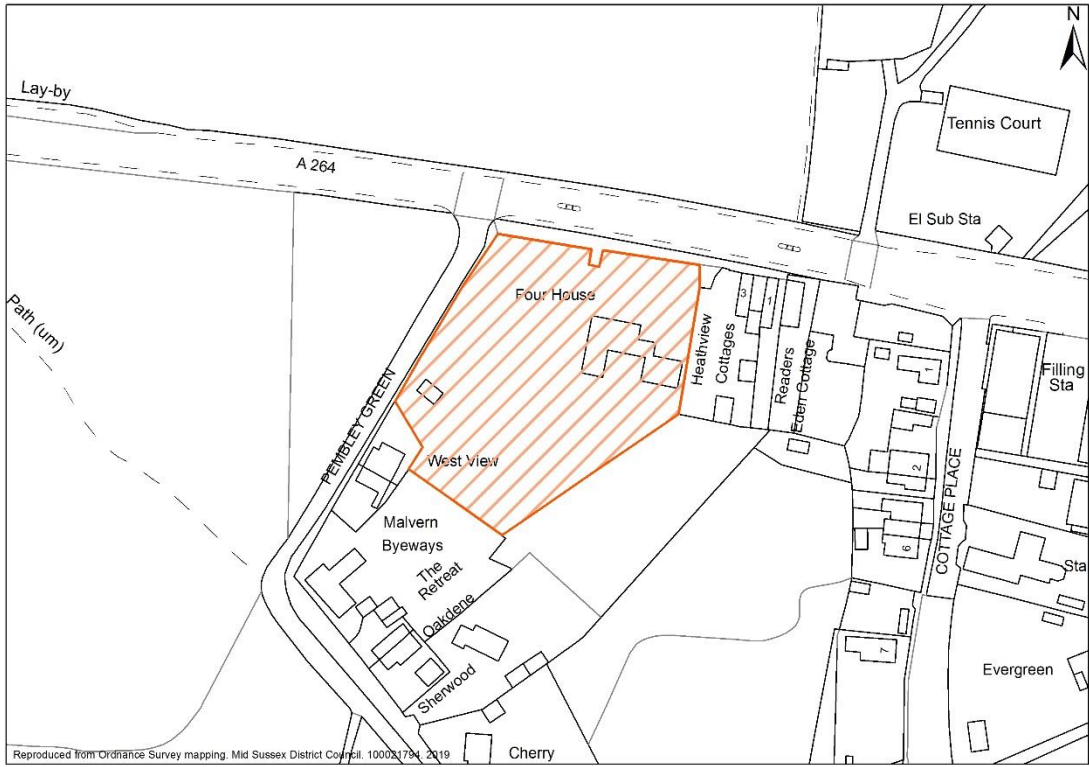
Barns Court and Firs Farm, Turners Hill Road, Cophorne

SHELAA: 914 **Settlement:** Cophorne **Gross Site Area (ha):** 1.8



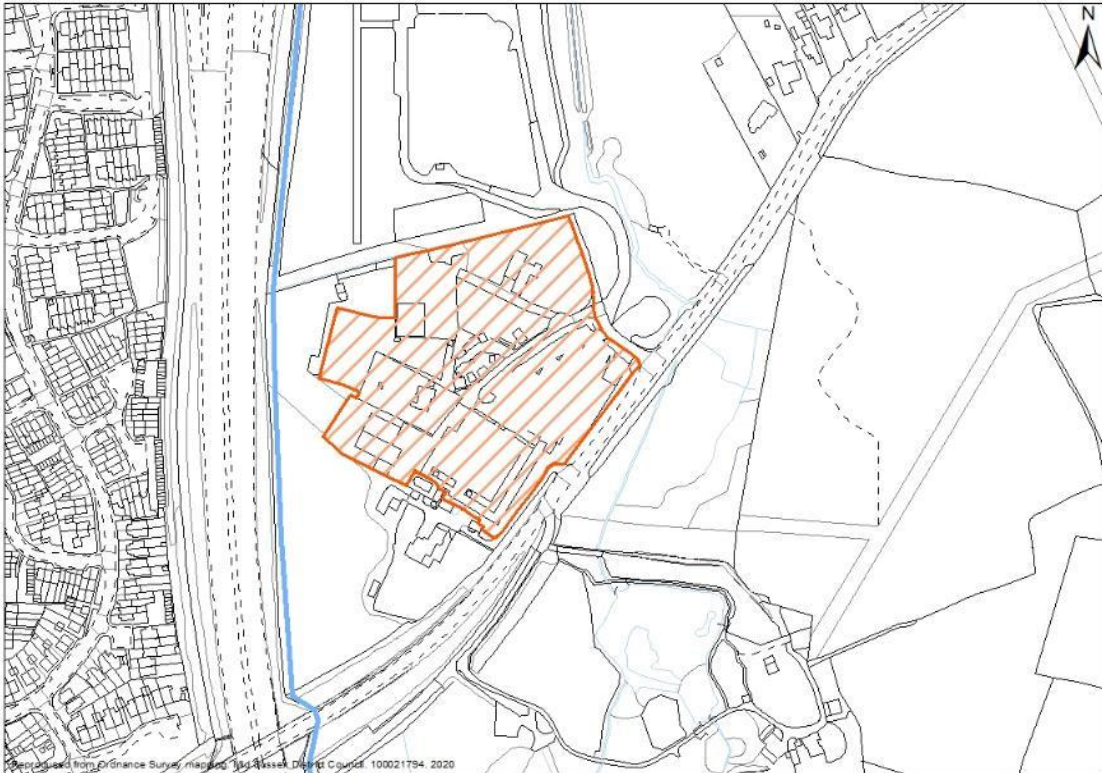
Mint House (Four House), Cophorne Common Road, Cophorne

SHELAA: 413 **Settlement:** Cophorne **Gross Site Area (ha):** 0.43



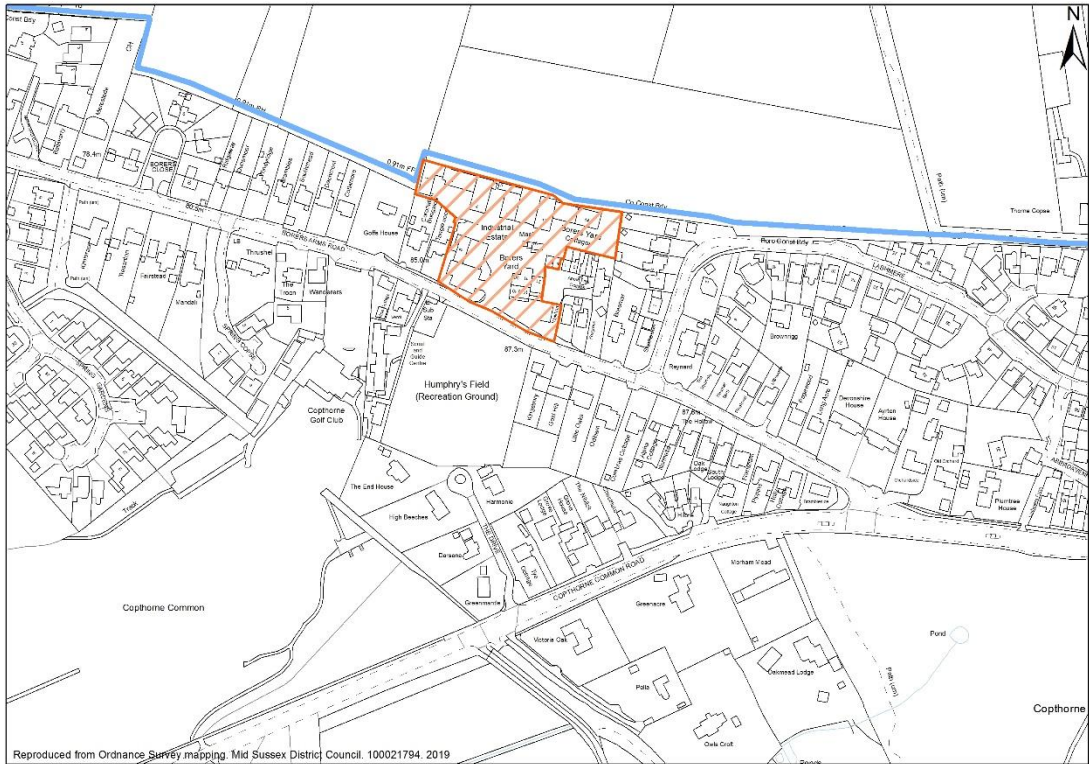
Crawley Garden Centre, Cophorne Road A220

SHELAA: 604 **Settlement:** Cophorne **Gross Site Area (ha):** 2.5



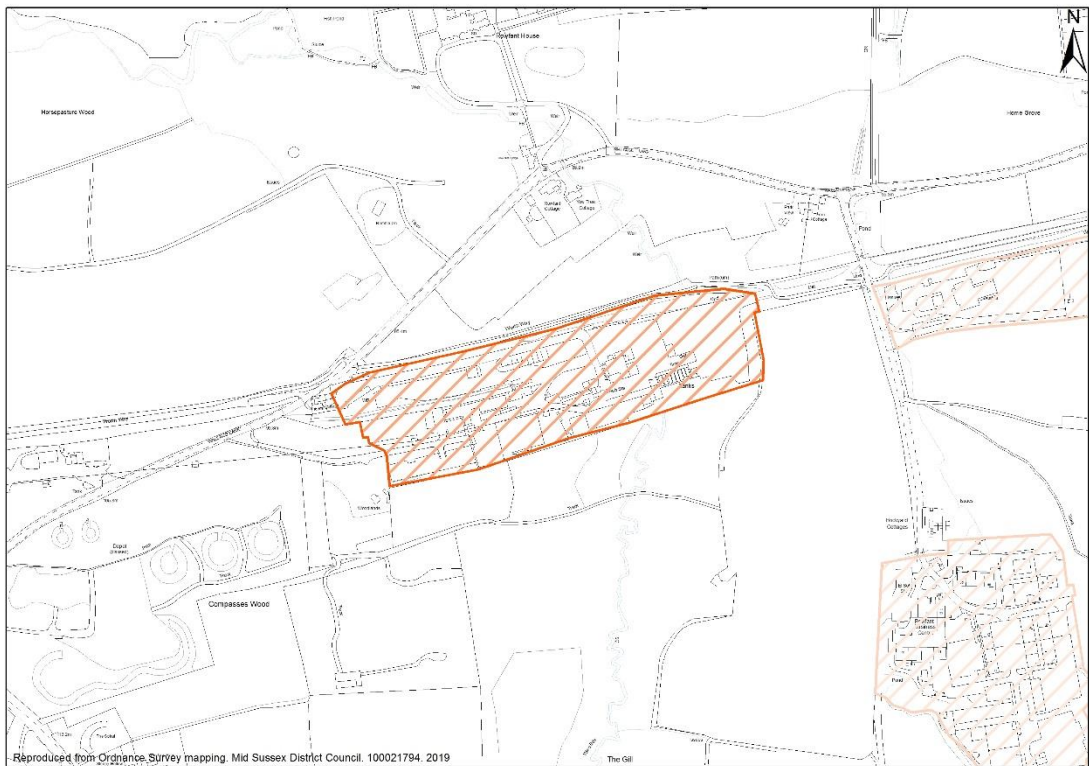
Borers Yard, Borers Arms Road, Copthorne

SHELAA: 890 **Settlement:** Copthorne **Gross Site Area (ha):** 0.80



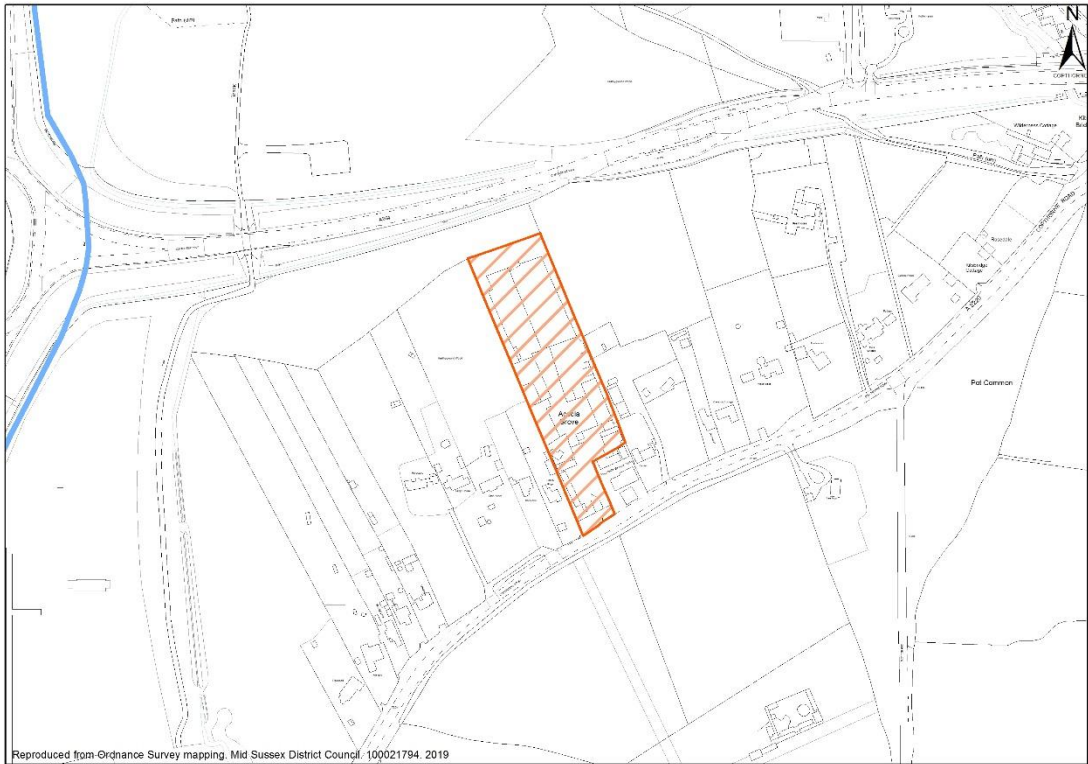
Colas, Wallage Lane, Rowfant

SHELAA: 892 **Settlement:** Copthorne **Gross Site Area (ha):** 4.5



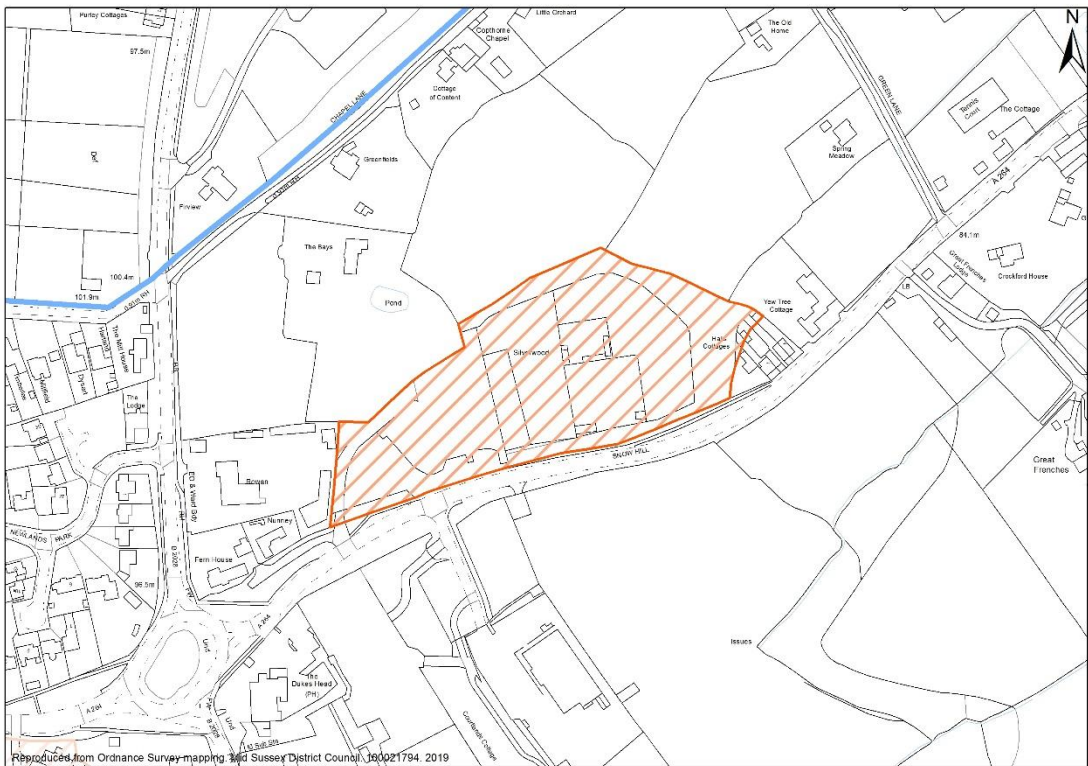
Acacia Grove, Copthorne Road, Copthorne

SHELAA: 429 **Settlement:** Crawley Down **Gross Site Area (ha):** 1.34



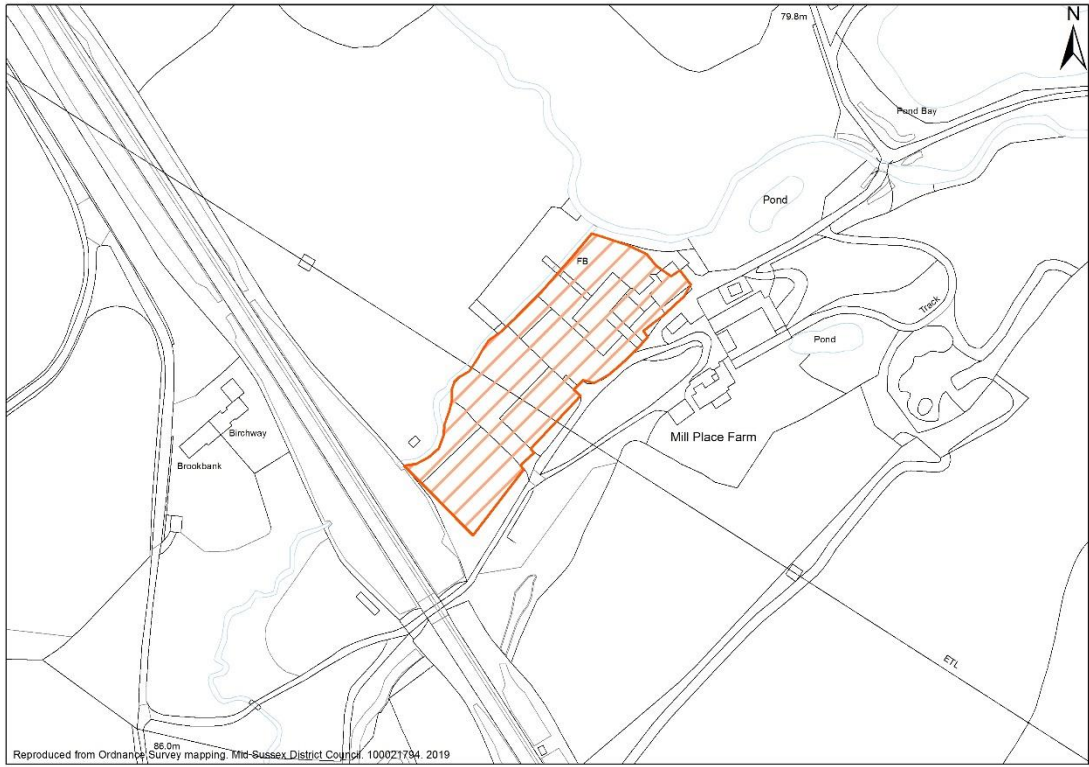
Land at Silverwood, Snowhill, Crawley Down

SHELAA: 267 **Settlement:** Crawley Down **Gross Site Area (ha):** 2.3



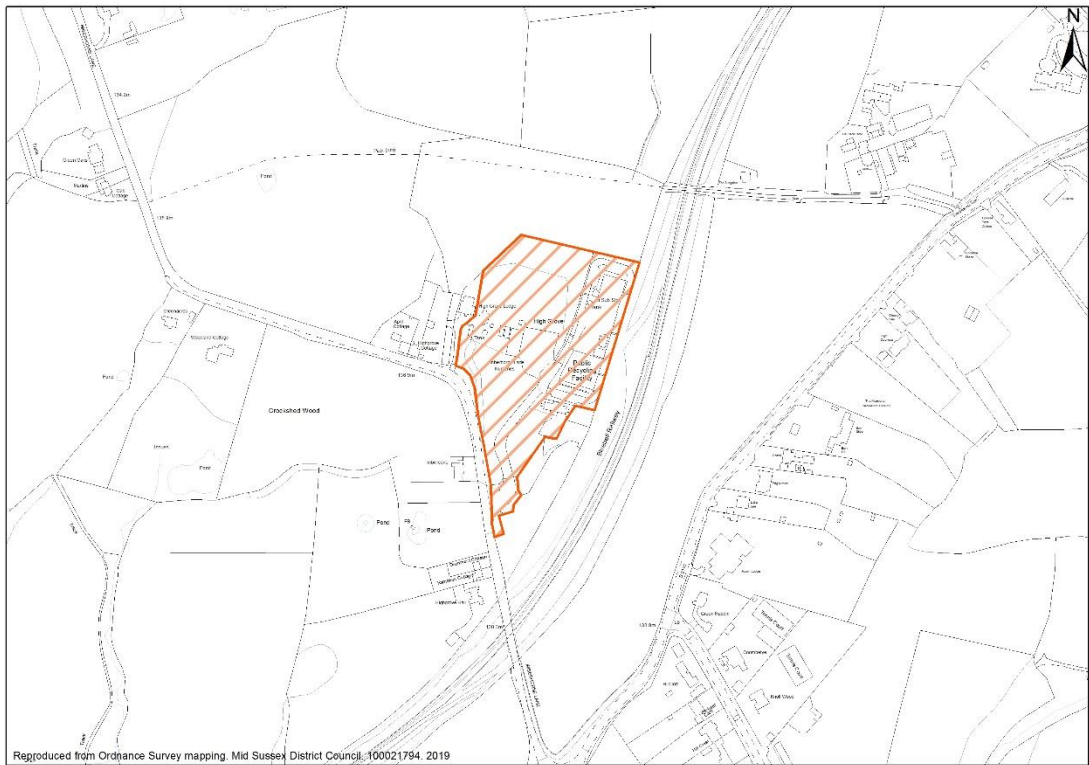
Mill Place Farm, Vowels Lane, East Grinstead

SHELAA: 874	Settlement: East Grinstead	Gross Site Area (ha): 0.74
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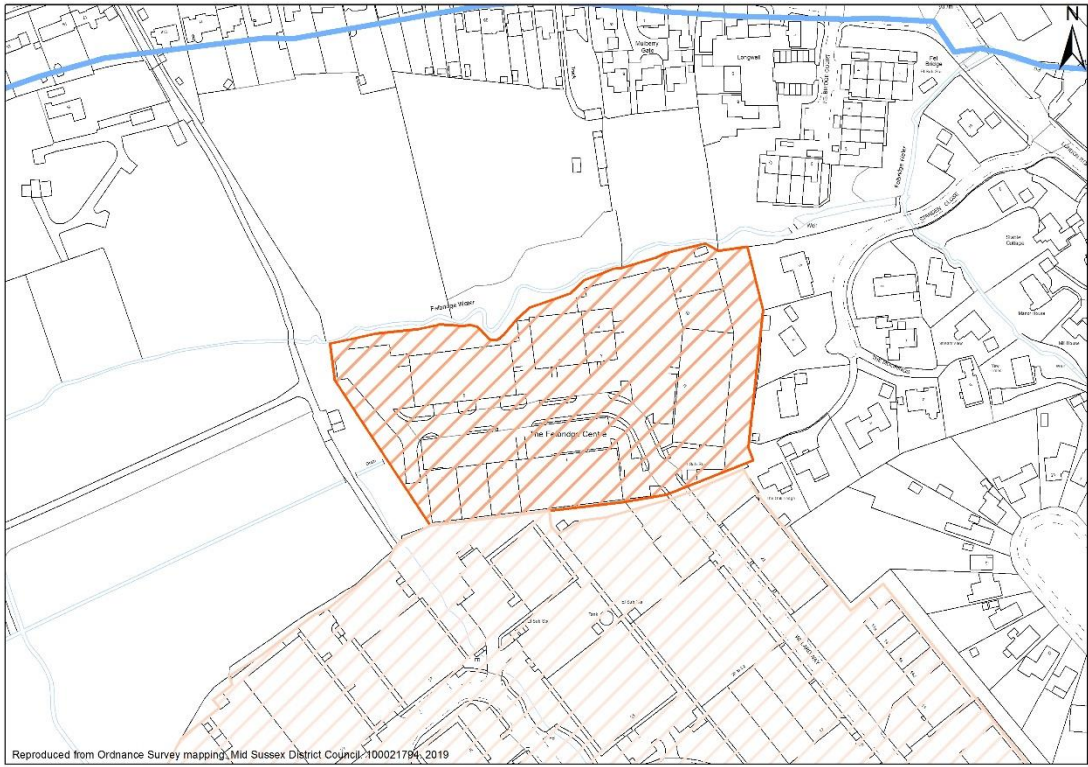
High Grove, Imberhorne Lane, East Grinstead

SHELAA: 867	Settlement: East Grinstead	Gross Site Area (ha): 2.3
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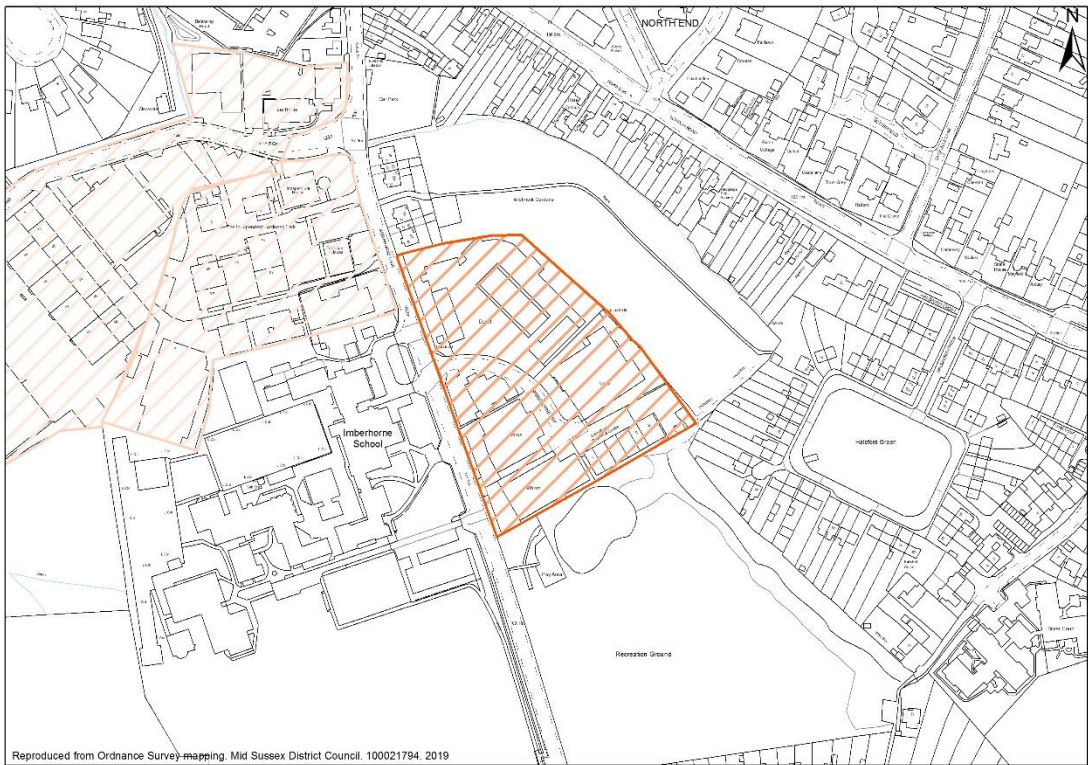
Felbridge Centre, Birches Industrial Estate, East Grinstead

SHELAA: 869 **Settlement:** East Grinstead **Gross Site Area (ha):** 2



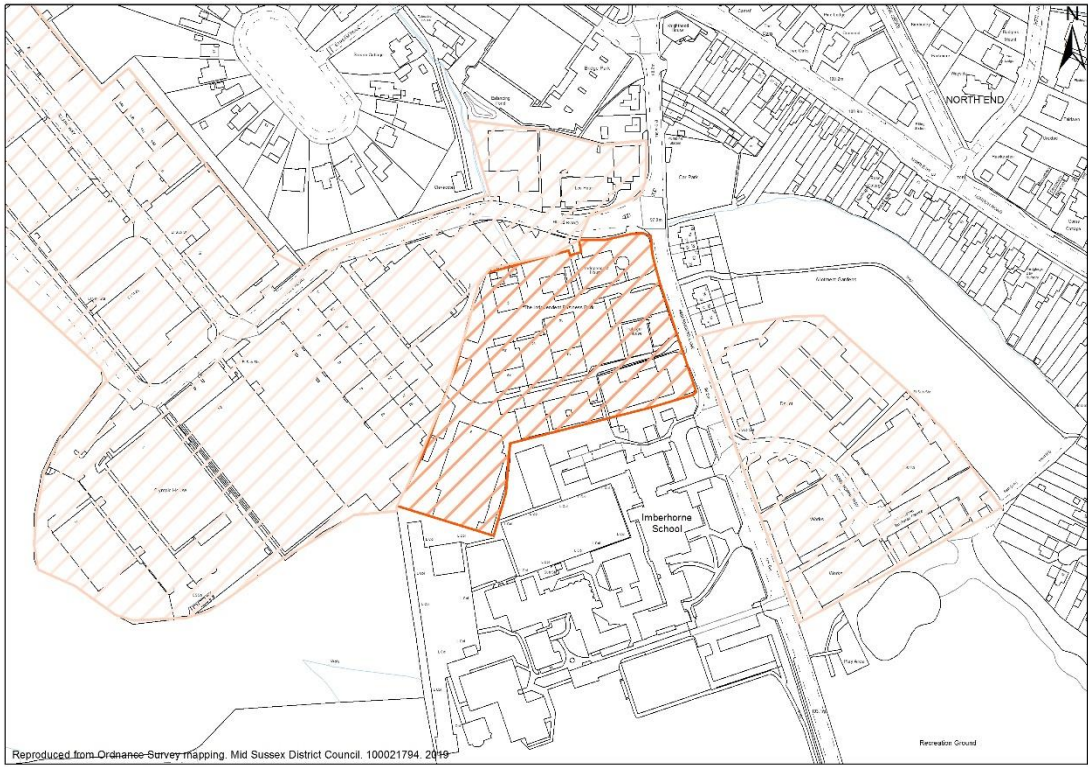
Imberhorne Way, East Grinstead

SHELAA: 870 **Settlement:** East Grinstead **Gross Site Area (ha):** 1.9



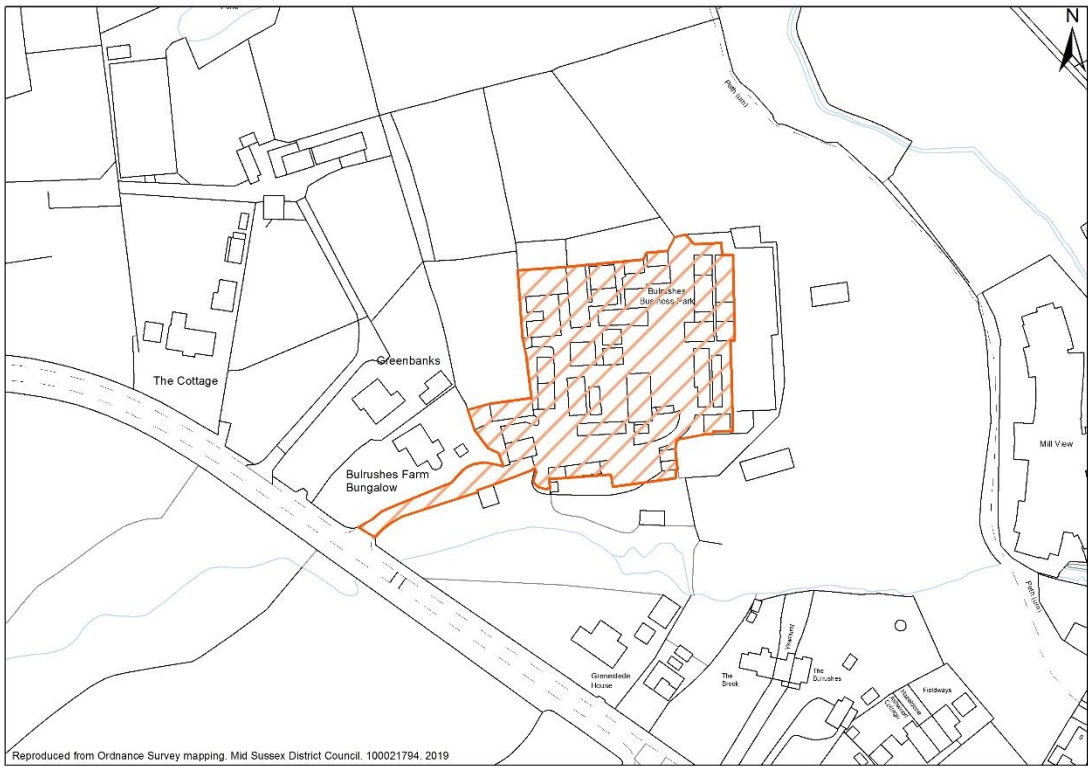
Independent Business Park, Imberhorne Lane, East Grinstead

SHELAA: 871 **Settlement:** East Grinstead **Gross Site Area (ha):** 1.7



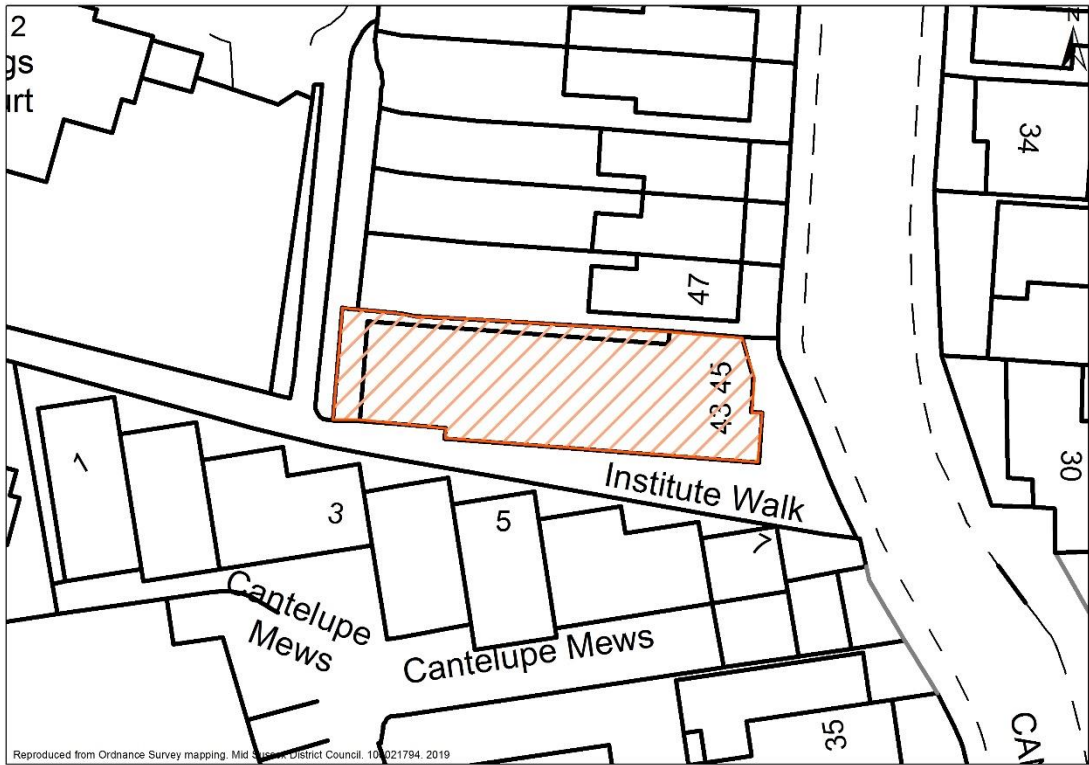
Bulrushes Business Park, Coombe Hill Road, East Grinstead

SHELAA: 873 **Settlement:** East Grinstead **Gross Site Area (ha):** 0.63



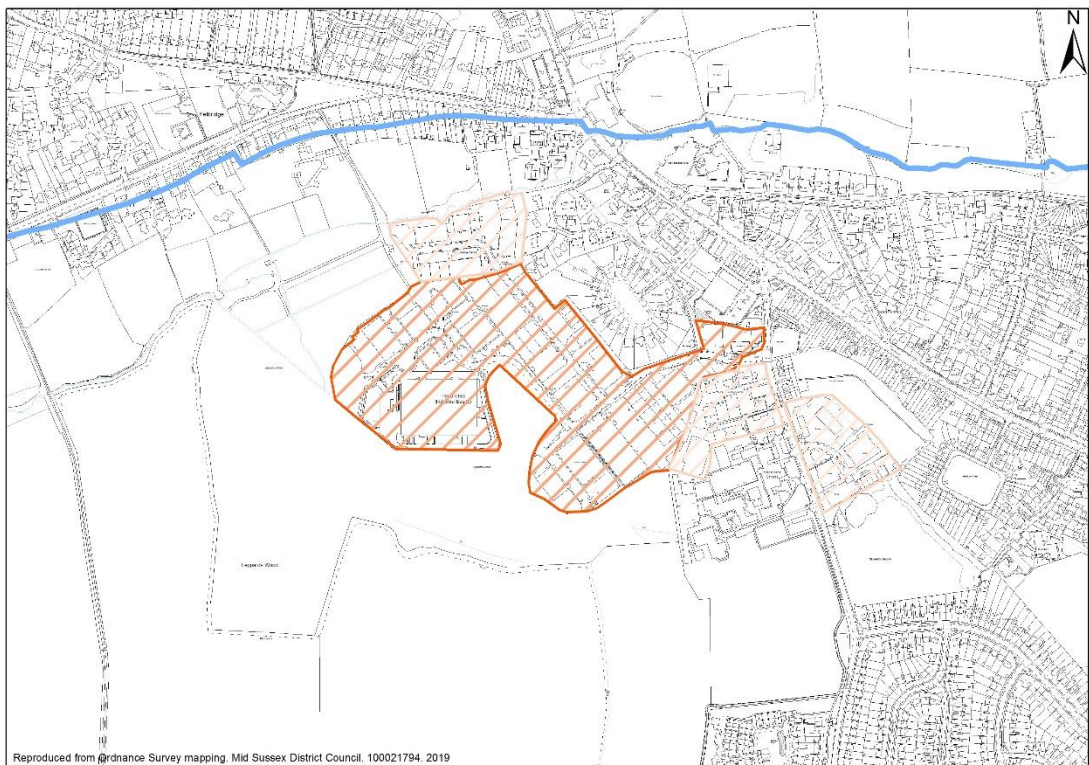
43-45 Cantelupe Road, East Grinstead

SHELAA: 414 **Settlement:** East Grinstead **Gross Site Area (ha):** 0.03



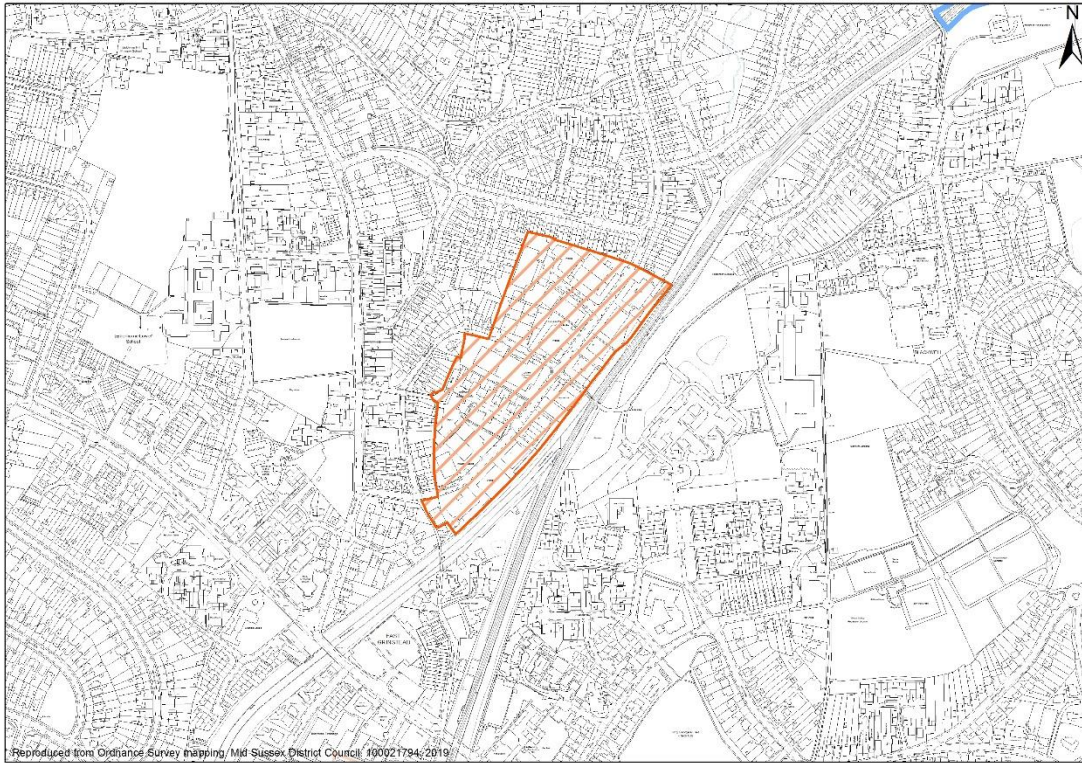
Birches Industrial Estate, East Grinstead

SHELAA: 868 **Settlement:** East Grinstead **Gross Site Area (ha):** 13.2



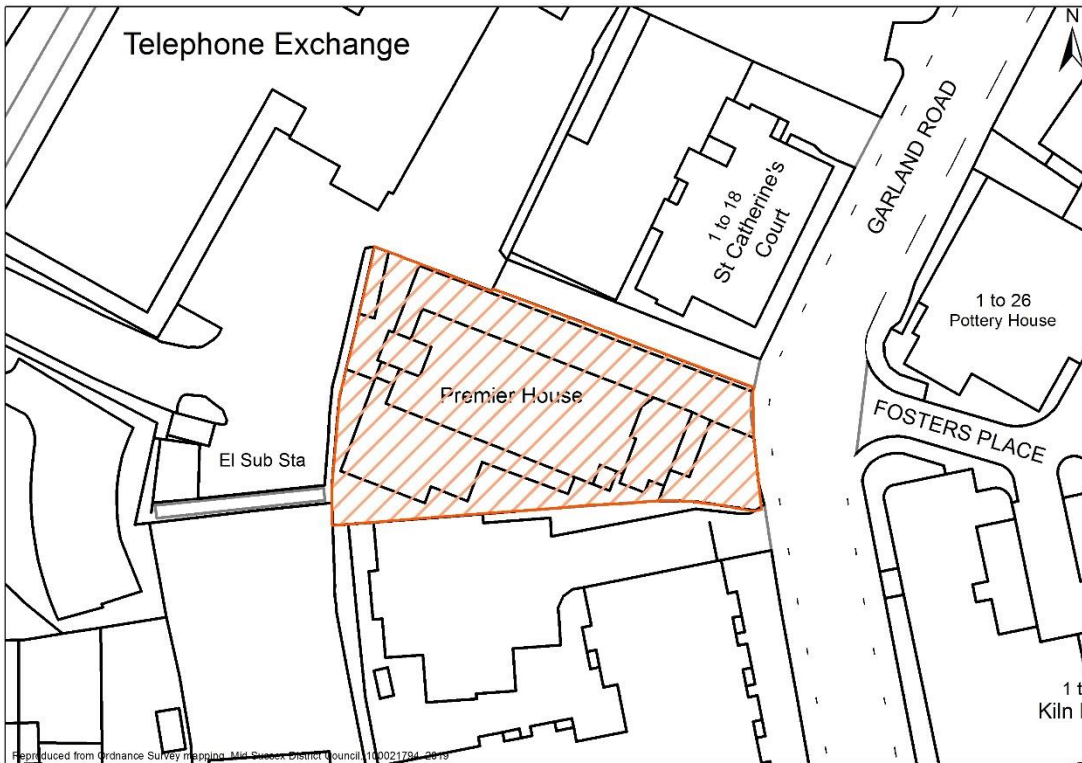
Charwoods Industrial Estate, East Grinstead

SHELAA: 222 **Settlement:** East Grinstead **Gross Site Area (ha):** 5.7



Premier House, Garland Road, East Grinstead

SHELAA: 323 **Settlement:** East Grinstead **Gross Site Area (ha):** 0.12



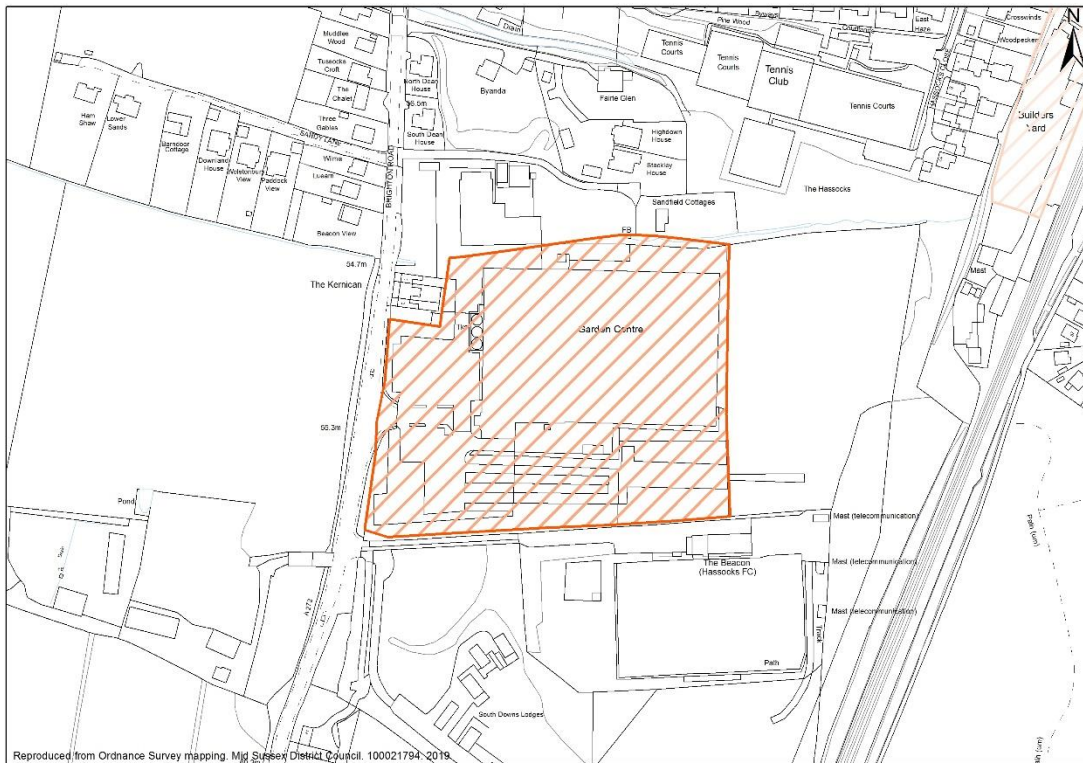
Former Handcross Garden Centre, Handcross

SHELAA: 605	Settlement: Handcross	Gross Site Area (ha): 2.6
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Tates (South Downs Garden Centre), Brighton Road, Hassocks

SHELAA: 171	Settlement: Hassocks	Gross Site Area (ha): 3.4
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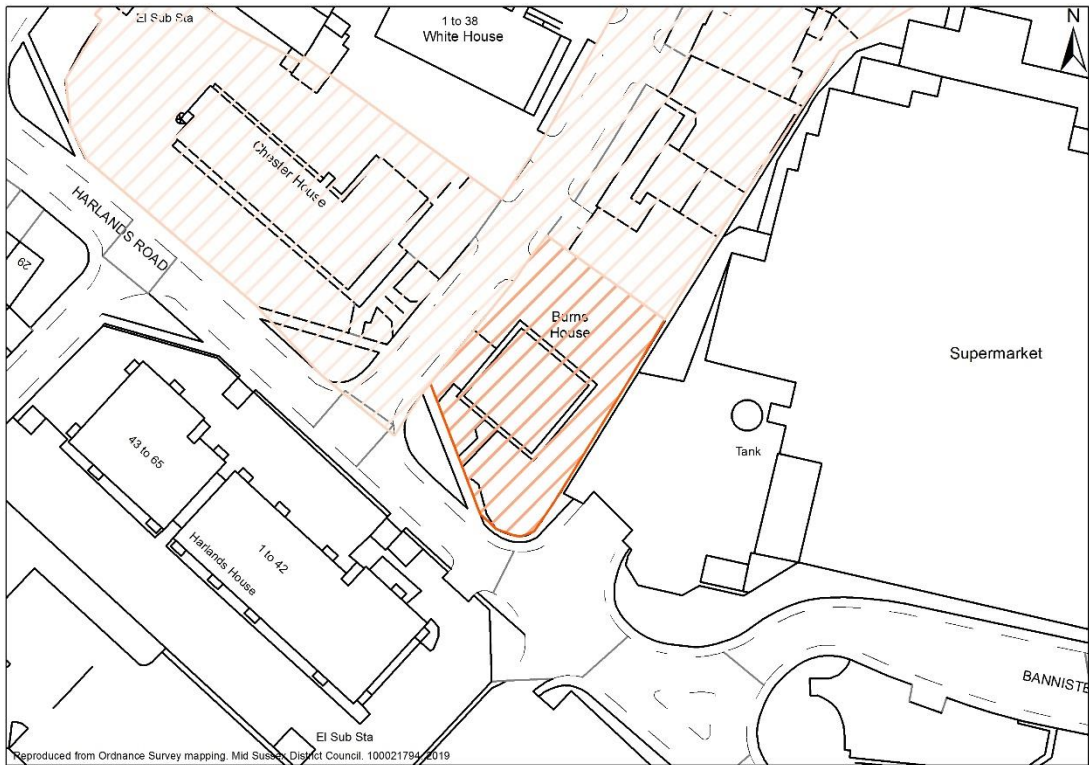
Concord House, Balcombe Road, Haywards Heath

SHELAA: 353 **Settlement:** Haywards Heath **Gross Site Area (ha):** 0.11



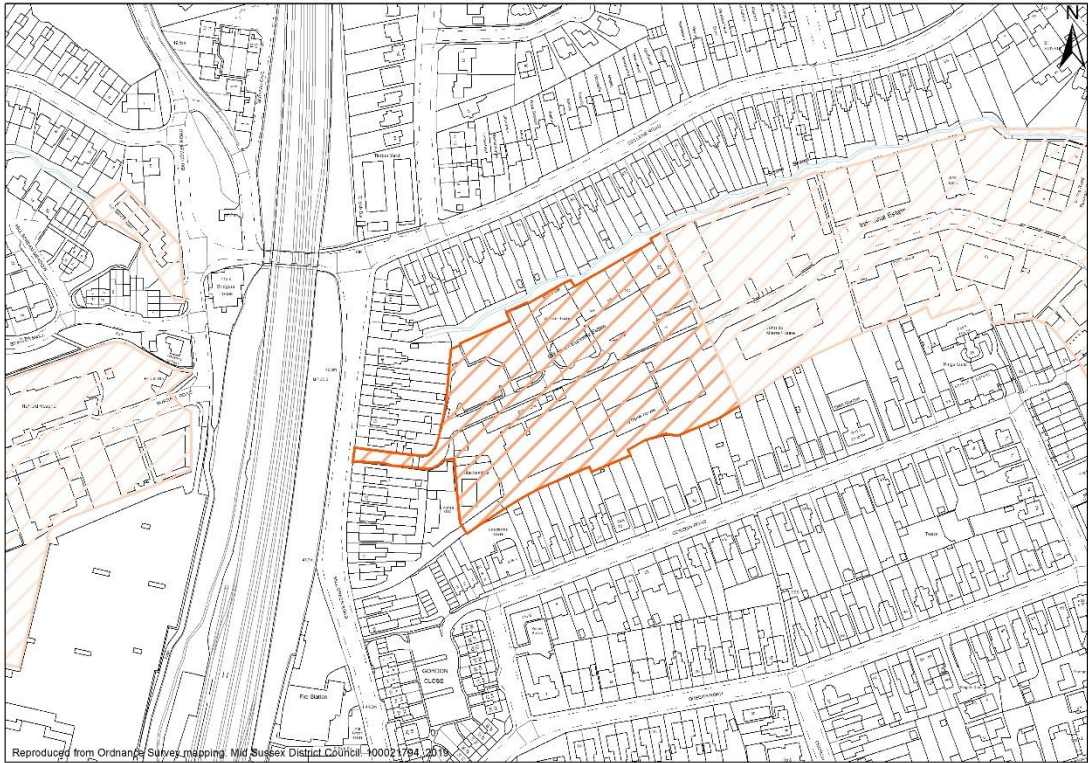
Burns House, Harlands Road, Haywards Heath

SHELAA: 708 **Settlement:** Haywards Heath **Gross Site Area (ha):** 0.13



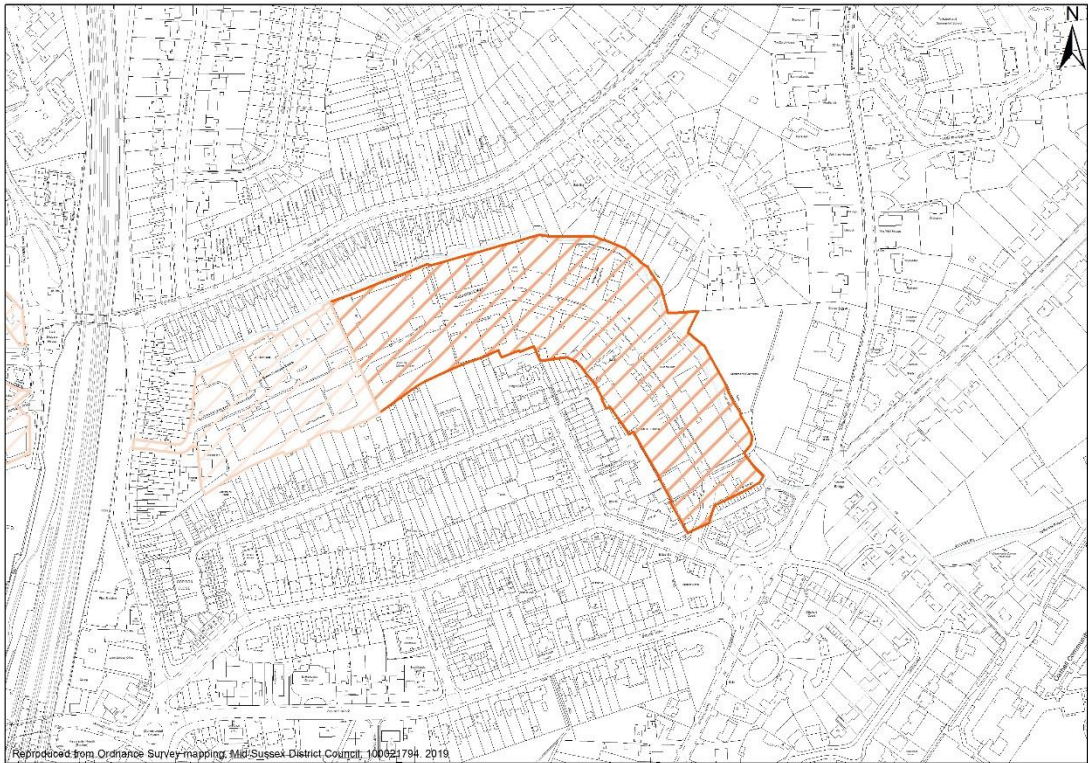
Mill Green Business Park, Haywards Heath

SHELAA: 938 **Settlement:** Haywards Heath **Gross Site Area (ha):** 1.5



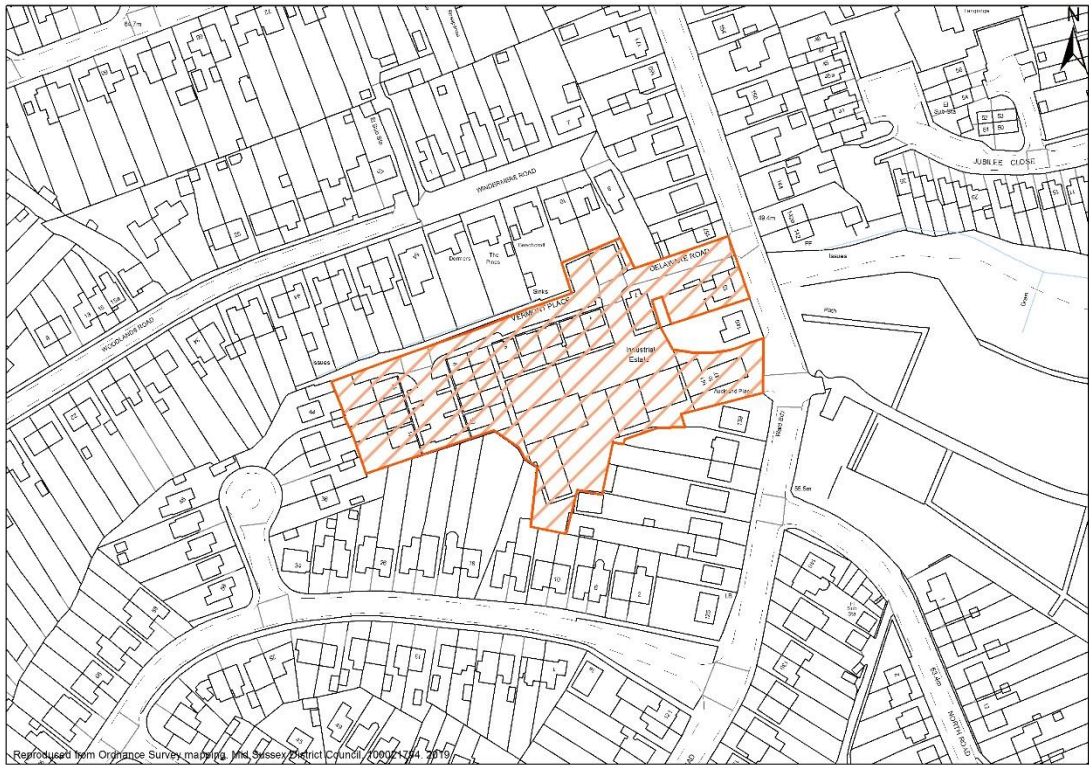
Bridge Road Industrial Estate, Haywards Heath

SHELAA: 935 **Settlement:** Haywards Heath **Gross Site Area (ha):** 3.98



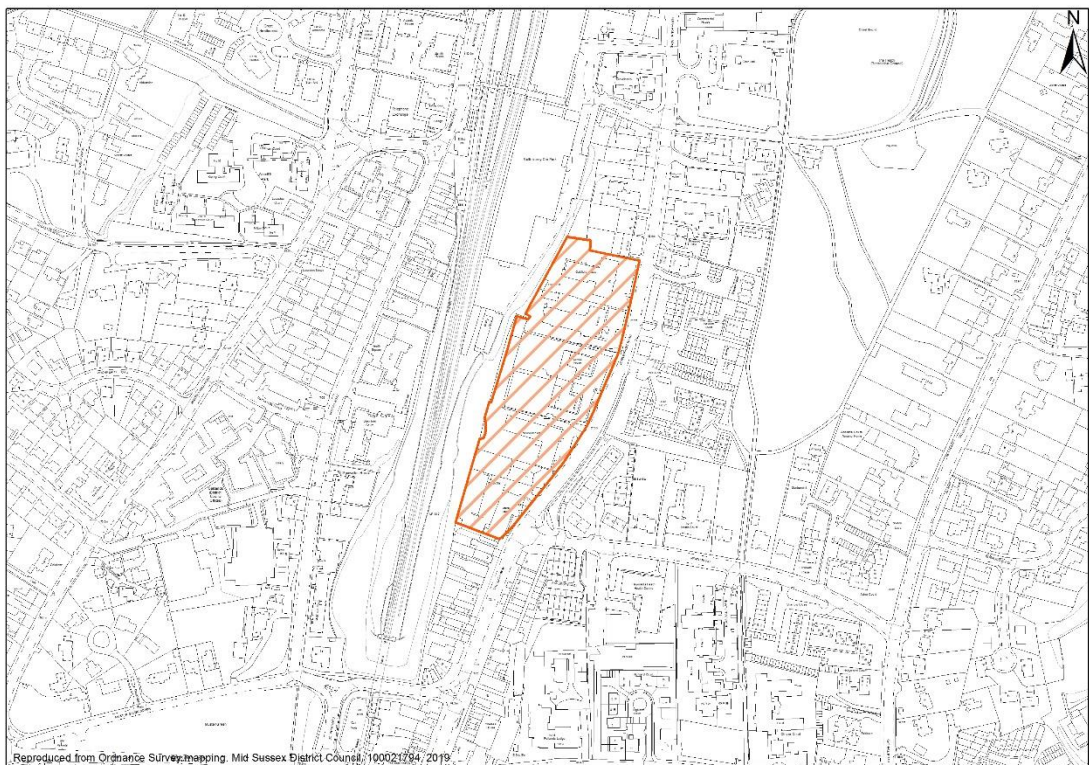
Western Road Industrial Estate, Western Road, Haywards Heath

SHELAA: 877 **Settlement:** Haywards Heath **Gross Site Area (ha):** 0.8



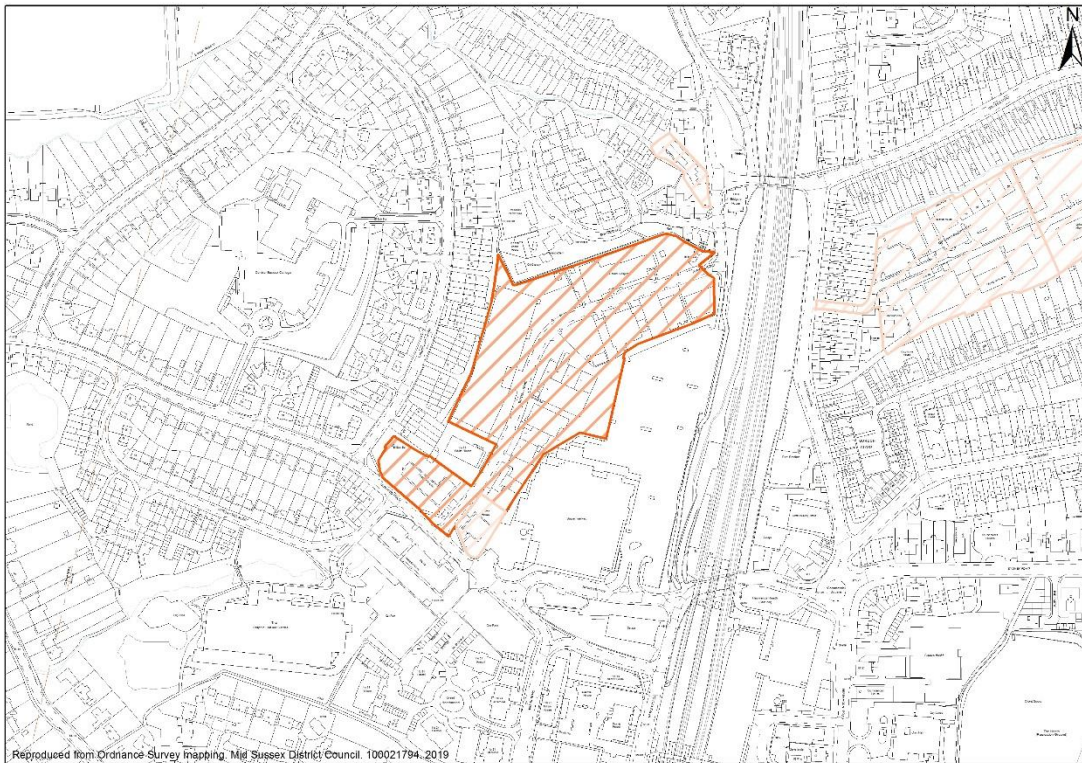
Perrymount Road, Haywards Heath

SHELAA: 876 **Settlement:** Haywards Heath **Gross Site Area (ha):** 1.9



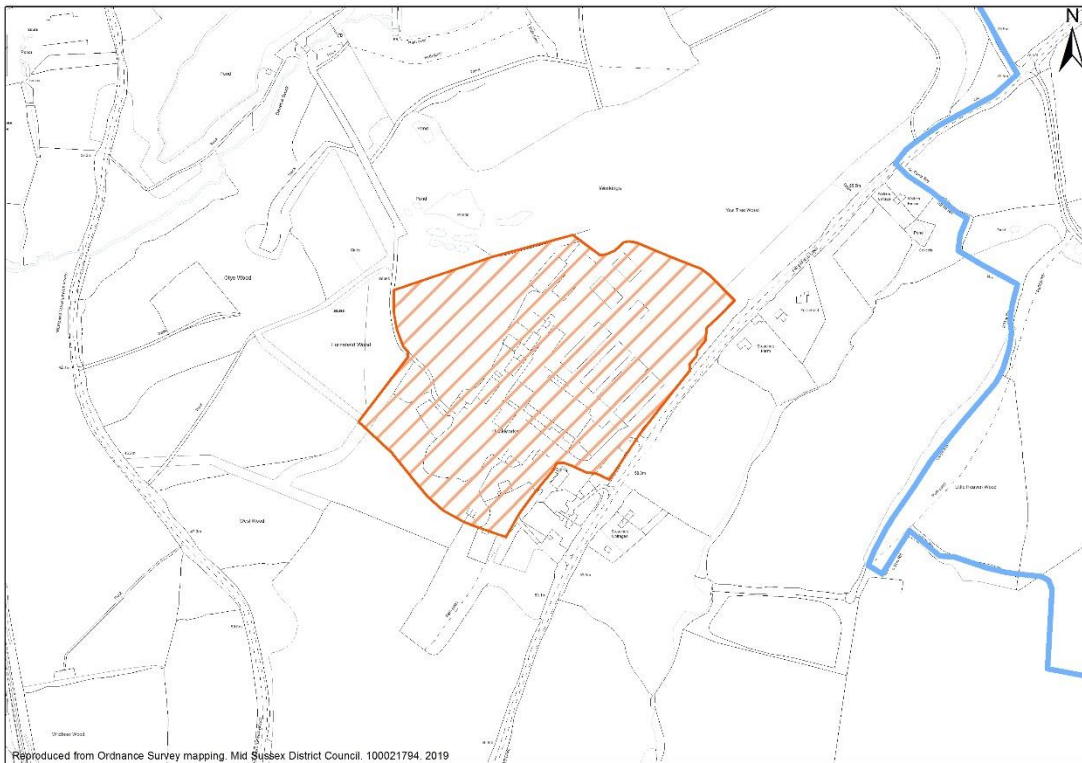
Burrell Road Industrial Estate, Haywards Heath

SHELAA: 875	Settlement: Haywards Heath	Gross Site Area (ha): 3.2
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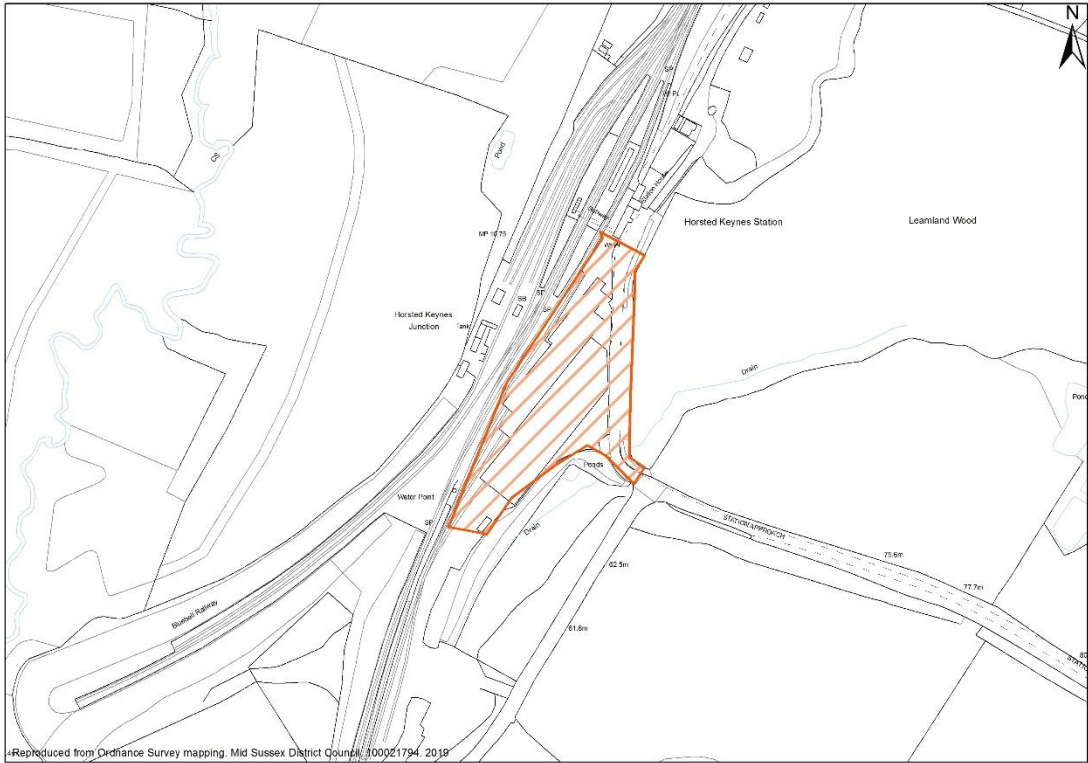
Freshfield Lane Brickworks, Freshfield Lane, Danehill

SHELAA: 878	Settlement: Horsted Keynes	Gross Site Area (ha): 8.18
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Horsted Keynes Station, Station Approach, Horsted Keynes

SHELAA: 880 **Settlement:** Horsted Keynes **Gross Site Area (ha):** 1.02



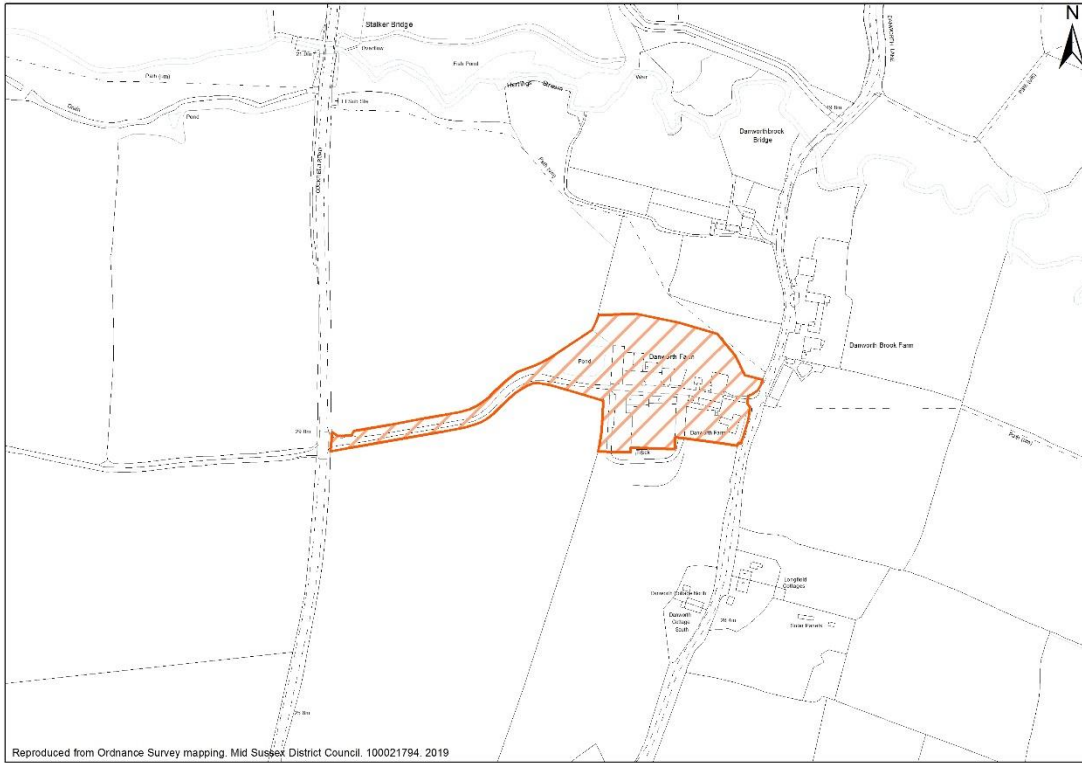
Horsted Keynes Industrial Park, Horsted Keynes

SHELAA: 879 **Settlement:** Horsted Keynes **Gross Site Area (ha):** 1.5



Danworth Farm, Cuckfield Road, Hurstpierpoint

SHELAA: 937 **Settlement:** Hurstpierpoint **Gross Site Area (ha):** 1.59



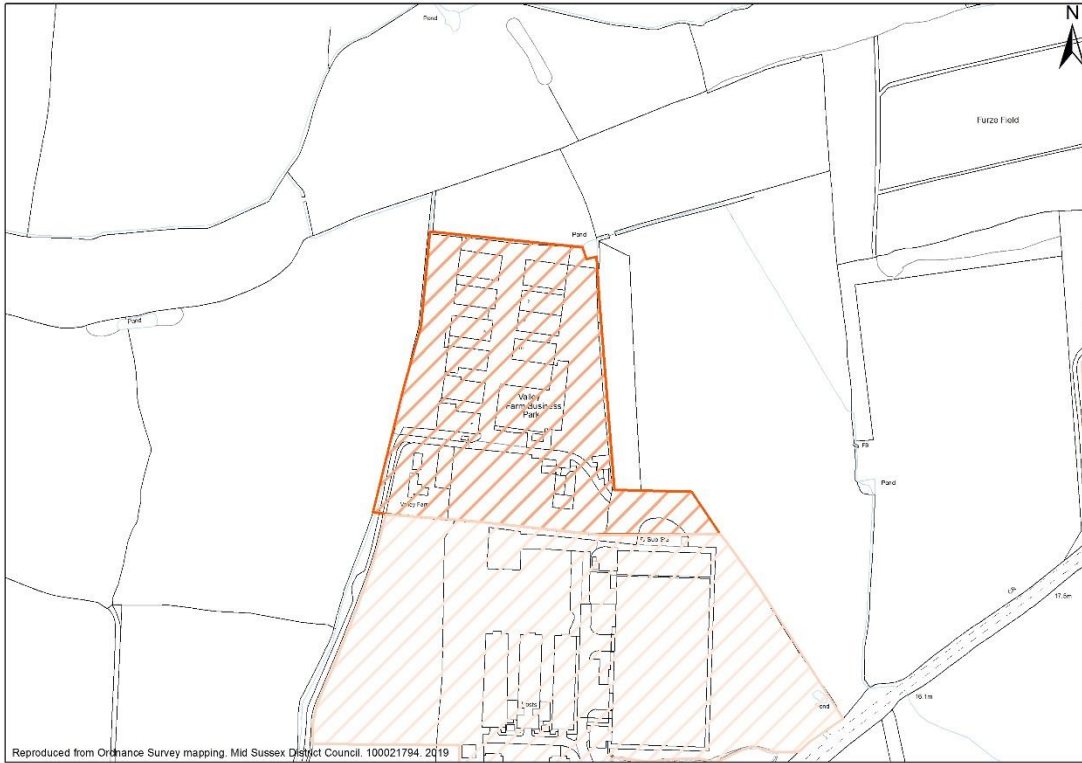
Kings Business Centre, Reeds Lane, Sayers Common

SHELAA: 669 **Settlement:** Hurstpierpoint and Sayers Common **Gross Site Area (ha):** 0.8



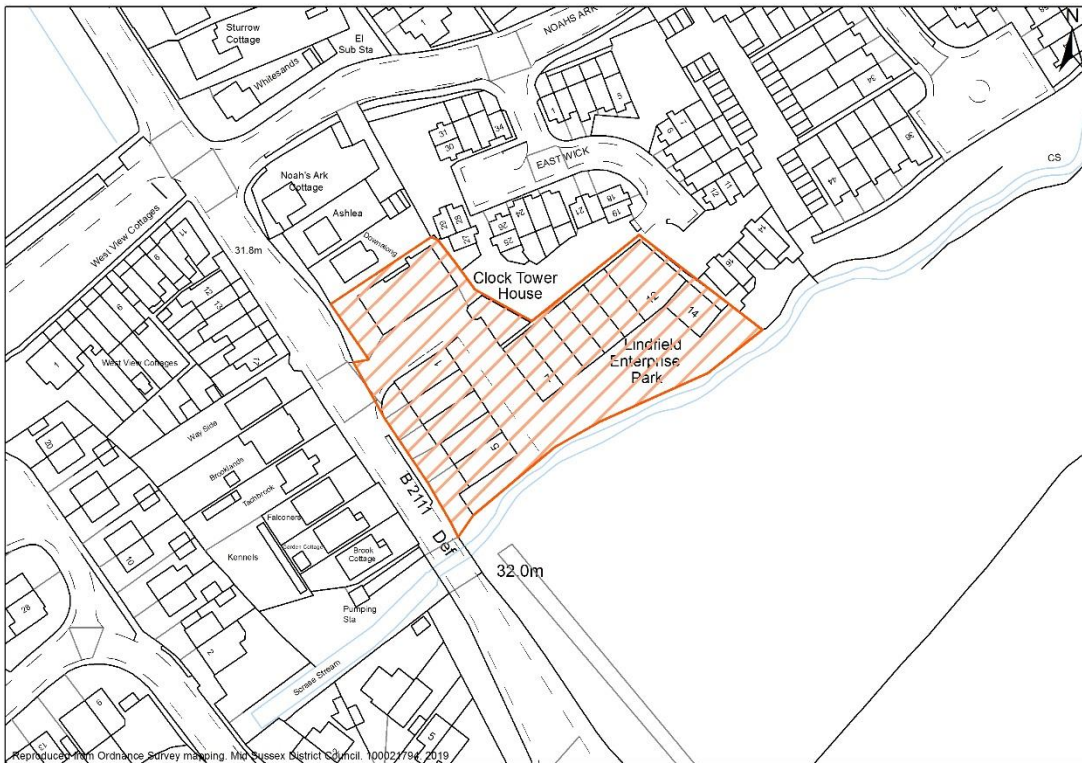
Valley Farm Business Park, Reeds Lane, Sayers Common

SHELAA: 883 **Settlement:** Hurstpierpoint and Sayers Common **Gross Site Area (ha):** 3.14



Lindfield Enterprise Park, Lewes Road, Lindfield

SHELAA: 884 **Settlement:** Lindfield **Gross Site Area (ha):** 0.4



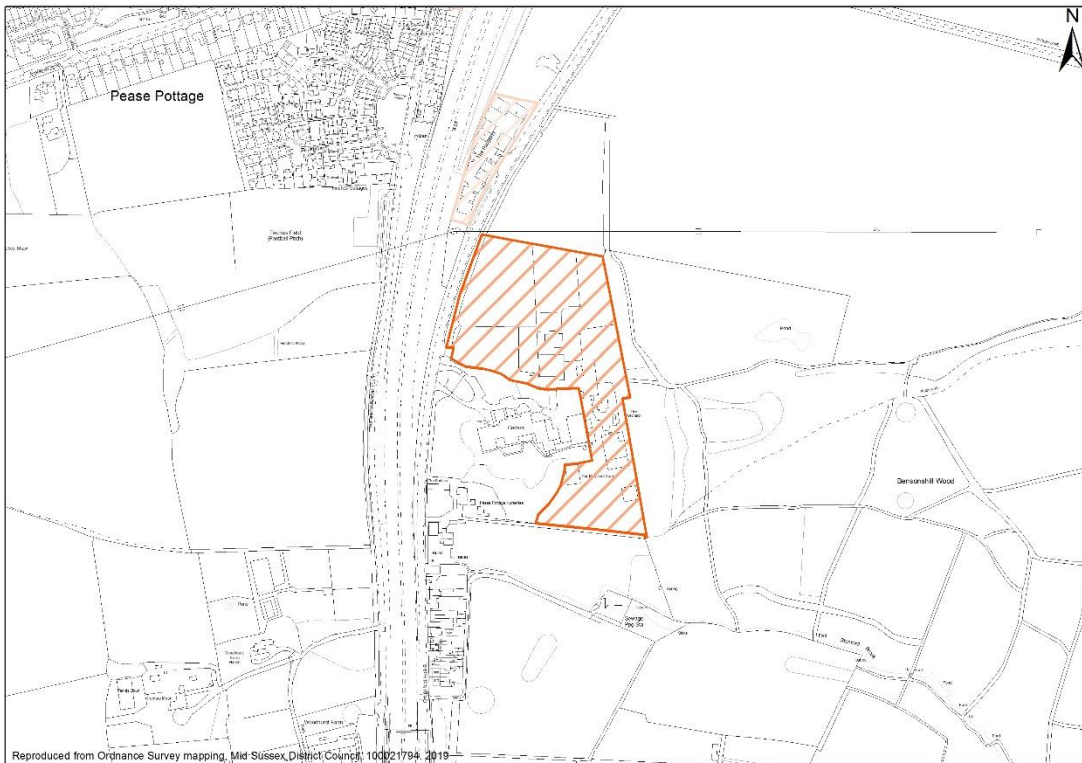
Old Brighton Road South, Pease Pottage

SHELAA: 648 **Settlement:** Pease Pottage **Gross Site Area (ha):** 0.46



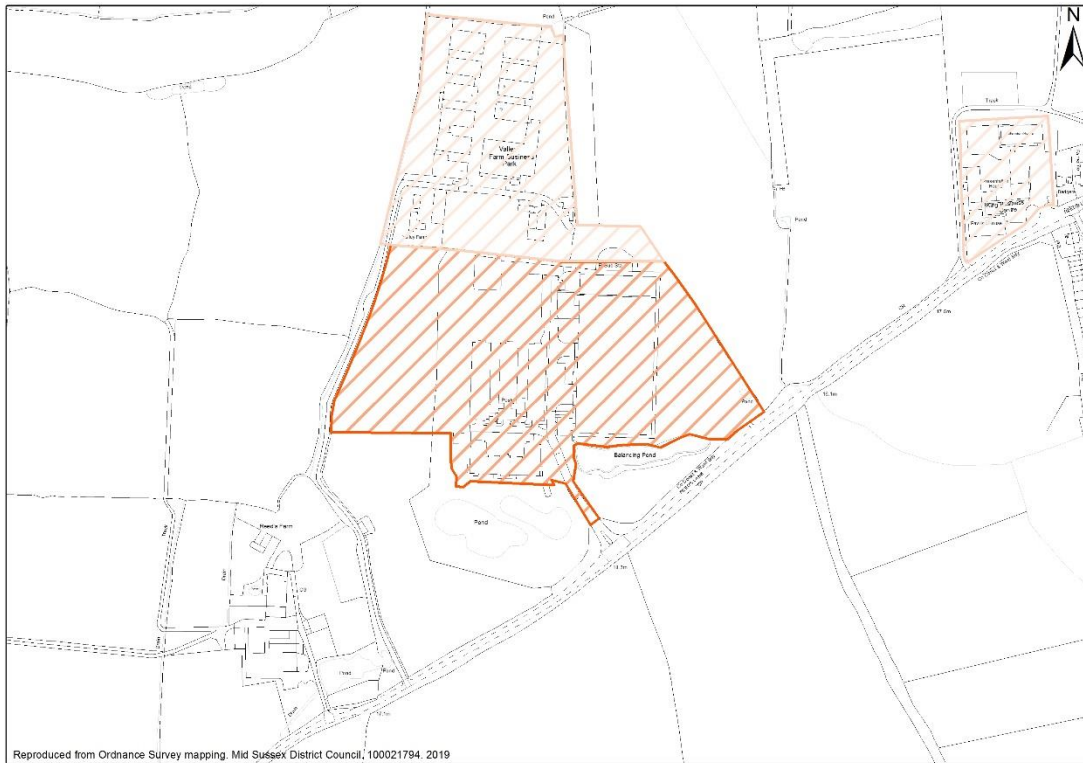
Land Off Brighton Road (Parking/Recycling Zone), Pease Pottage

SHELAA: 885 **Settlement:** Pease Pottage **Gross Site Area (ha):** 3.75



Avtrade Global, Reeds Lane

SHELAA: 882	Settlement: Sayers Common	Gross Site Area (ha): 4.03
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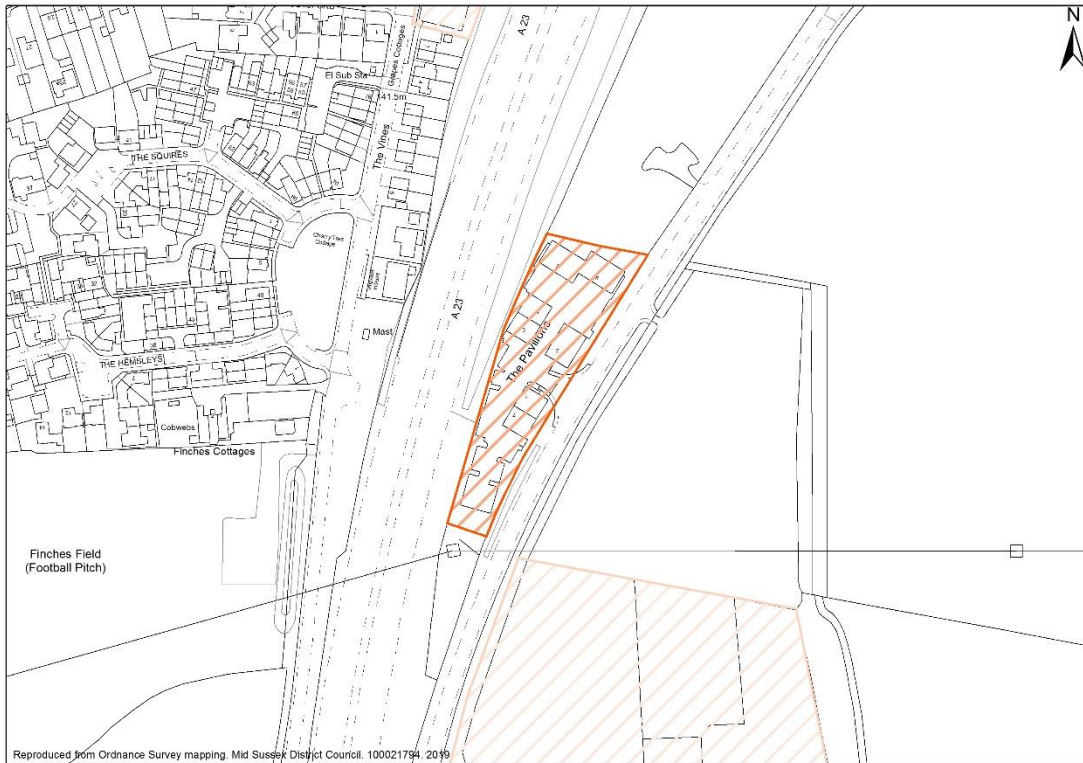
Friday Ad, London Road, Sayers Common

SHELAA: 944	Settlement: Sayers Common	Gross Site Area (ha): 1.36
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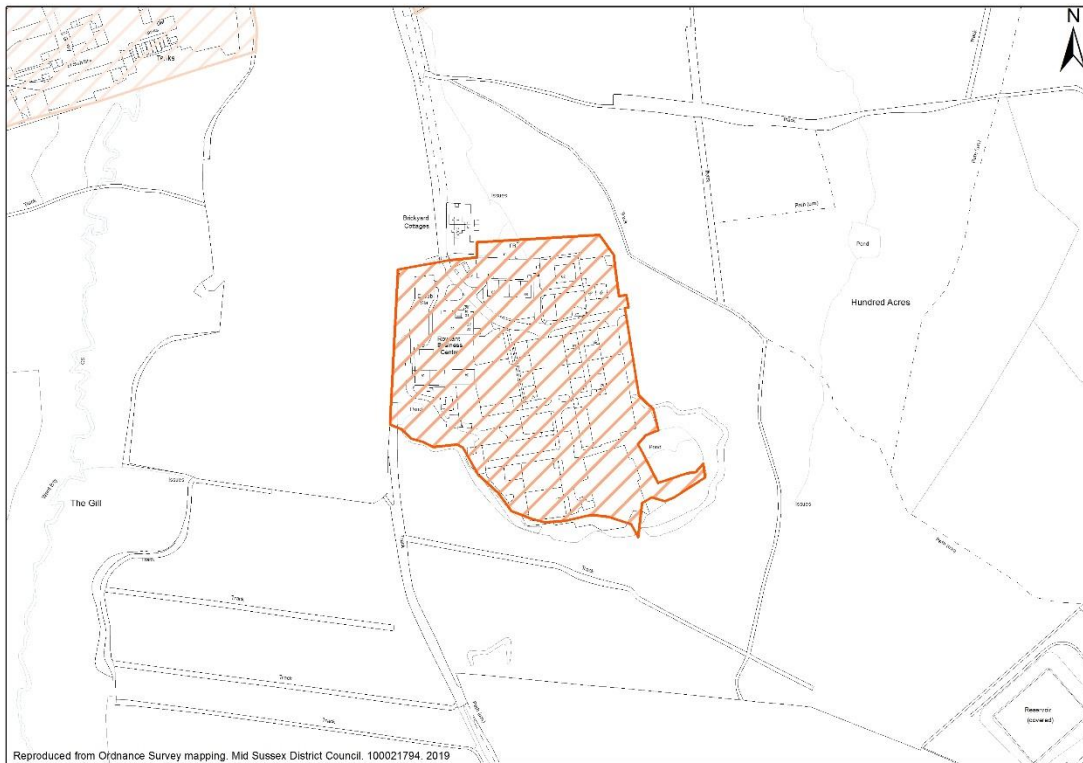
The Pavillions, Brighton Road, Pease Pottage

SHELAA: 887 **Settlement:** Slaughtam **Gross Site Area (ha):** 0.56



Rowfant Business Centre, Wallage Lane, Rowfant

SHELAA: 891 **Settlement:** Turners Hill **Gross Site Area (ha):** 4.15



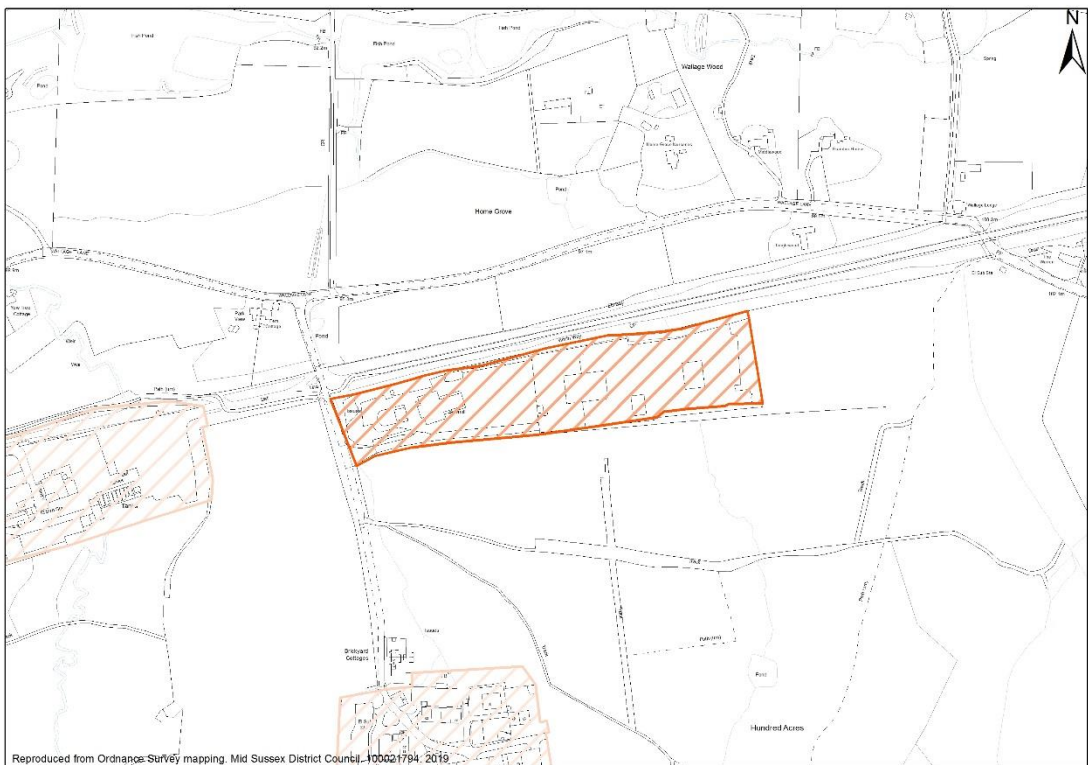
Millwood Farm, East Street, Turners Hill

SHELAA: 927 **Settlement:** Turners Hill **Gross Site Area (ha):** 0.7



Rowfant Sawmills, Wallage Lane, Crawley Down

SHELAA: 606 **Settlement:** Turners Hill **Gross Site Area (ha):** 2.8



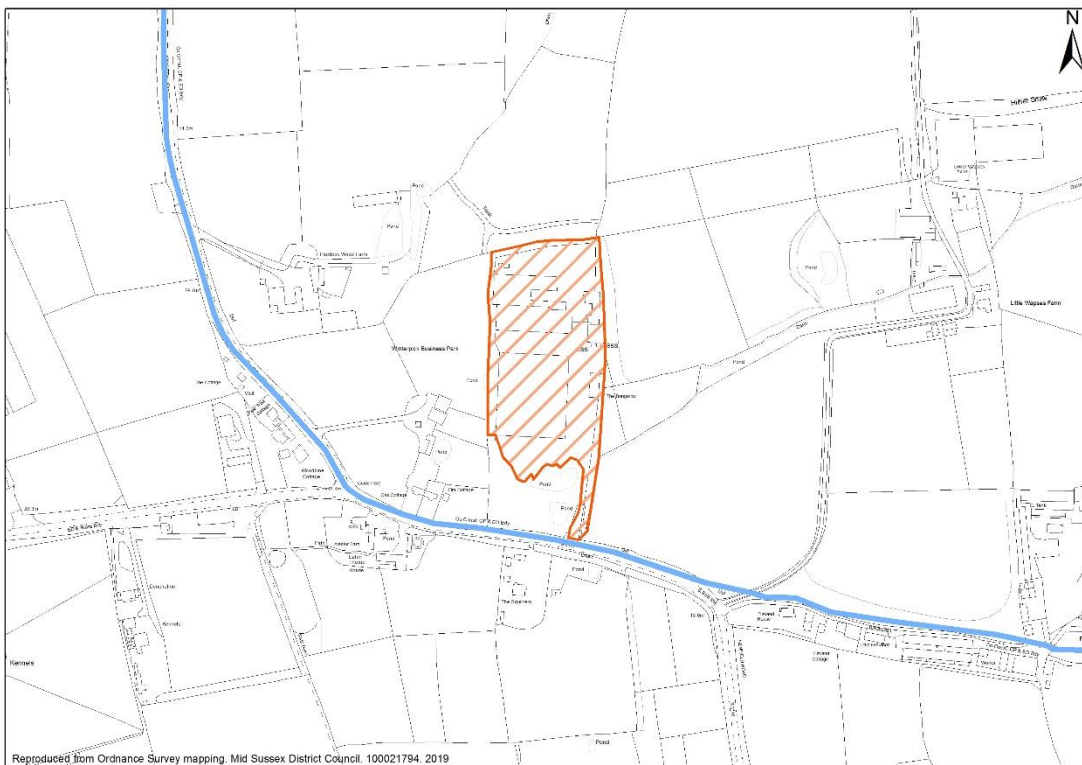
Land at Face Lift, London Road, Hickstead

SHELAA: 889 **Settlement:** Twineham **Gross Site Area (ha):** 0.9



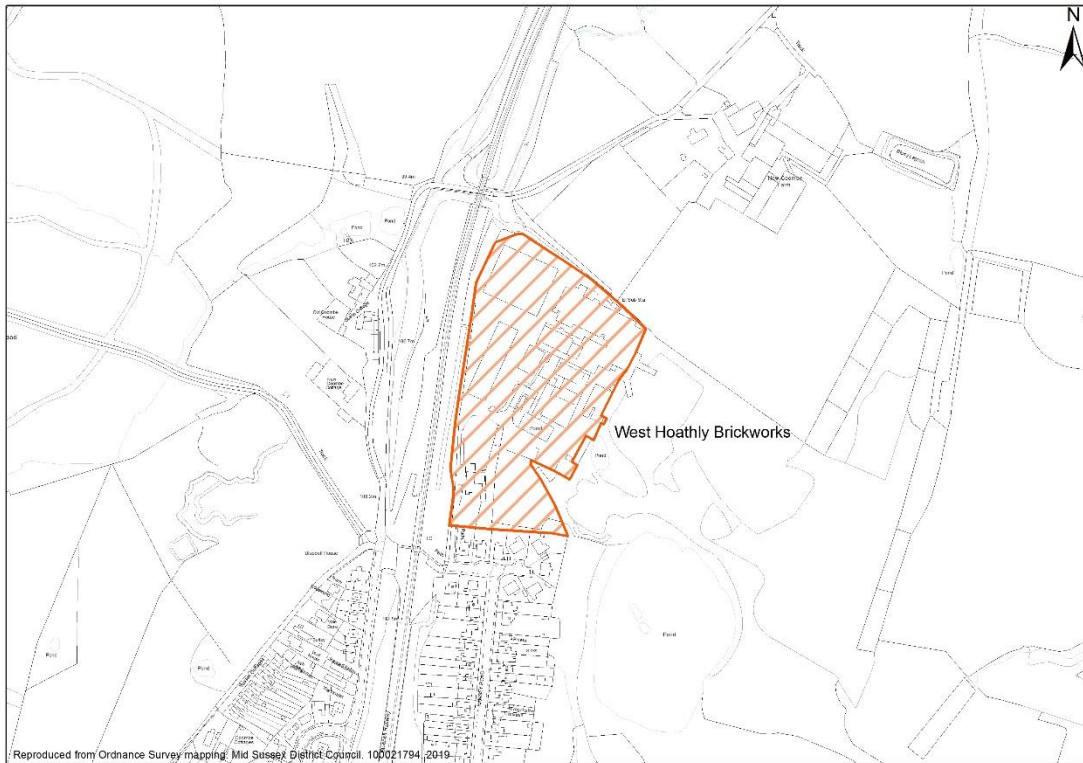
Winterpick Business Park, Hurstpierpoint Road, Henfield

SHELAA: 881 **Settlement:** Twineham **Gross Site Area (ha):** 2.5



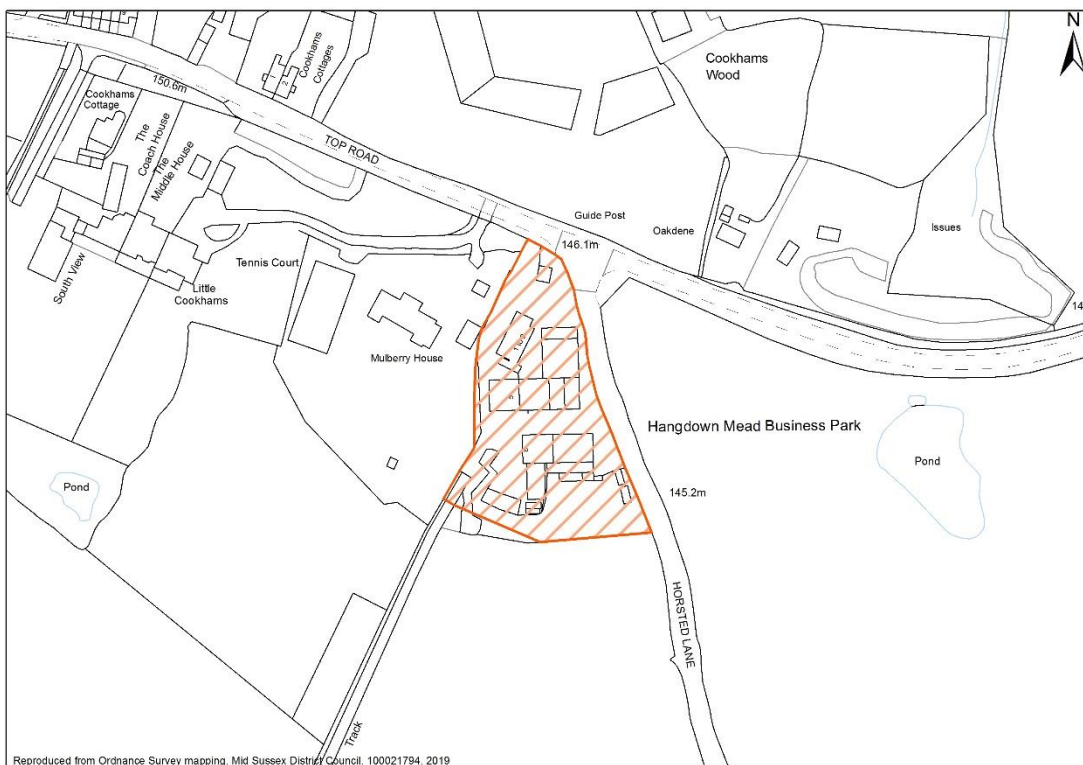
Ibstock Brickworks, Sharpthorne

SHELAA: 386 **Settlement:** West Hoathly **Gross Site Area (ha):** 3.136



Hangdown Mead Business Park, Top Road, Sharpthorne

SHELAA: 928 **Settlement:** West Hoathly **Gross Site Area (ha):** 0.53



Appendix B: Monitoring Framework

Monitoring Schedule

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA1: Sustainable Economic Development – Additional Site Allocations	7,8	Amount of employment land available on additional employment site allocations	Delivery to support sustainable economic development	Developers Local Authority	MSDC Monitoring
SA2 – SA8: Employment Site Allocations					
SA9: Science and Technology Park	7,8	Amount of employment land available by use class	Delivery of employment against the agreed phasing strategy, including use class mix	Developers Local Authority	MSDC Monitoring
SA10: Housing	All	Net number of housing commitments by parish	Commitments in line with identified residual housing need	Developers, Local Authority, Highway authority, public agencies, utility companies and service providers	MSDC Monitoring
SA11: Additional Housing Allocations	All	Net number of housing completions on additional housing allocations	Delivery to maintain identified requirement for five year housing land supply	Developers, Local Authority, Highway authority, public agencies, utility companies and service providers	MSDC Monitoring
SA12 – 33: Housing Site Allocations		Completed infrastructure projects on additional housing allocations	Meet the infrastructure requirements set out in Infrastructure Delivery Plan (IDP)		

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA34: Existing Employment Sites	7,8	Amount of employment land available on existing employment sites	Maximise to support sustainable economic development	Developers Local Authority	MSDC Monitoring
SA35: Safeguarding of Land for Strategic Highway Improvements	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy if necessary	Highway Authority Local Authority	MSDC Monitoring
		Progress of transport schemes identified in policy	Delivery of transport schemes identified in policy		
SA36: Wivelsfield Railway Station	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy if necessary	Highway Authority Local Authority	MSDC Monitoring
		Progress of expansion and upgrade of Wivelsfield railway station	Delivery of expansion and upgrade of Wivelsfield railway station		
SA37: Burgess Hill/ Haywards Heath Cycle Network	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy	Highway Authority Local Authority	MSDC Monitoring
		Progress of strategic cycle network identified in policy	Delivery of a dedicated strategic cycle network identified in policy		

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA38: Air Quality	2,3	Number of Air Quality Managements Areas (AQMAs) within the District	Minimise poor air quality in the District	Highway Authority Local Authority	MSDC Monitoring
		Number of applications refused as contrary to advice given by Environmental Protection Officer	Minimise poor air quality in the District		

Glossary

Adopted Policies Map – This shows the sites identified for development and areas where particular policies apply. It will be updated as each part of the Development Plan is adopted.

Ancient Woodland – Areas that have had continuous woodland cover since 1600.

Area of Outstanding Natural Beauty (AONB) – Areas designated to conserve and enhance natural beauty, wildlife and cultural heritage; and to meet the need for quiet enjoyment of the countryside and have regard for the interests of those who live and work within them. For example, the High Weald AONB.

Commitments – Sites already in the planning process which have planning permission for residential development or are allocated in the Development Plan.

Development Plan – Is defined in section 38 of the *Planning and Compulsory Purchase Act 2004 (as amended)*, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the Development Plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Development Plan Document (DPD) – These contain the detailed policies and proposals of the Development Plan and are subject to a rigorous statutory process, including community involvement. They are required to carry out a Sustainability Appraisal and are subject to independent examination and Council agreement before adoption. These documents include the District Plan and the Site Allocations DPD.

District Plan – The Mid Sussex District Plan 2014-2031 is the Local Plan for Mid Sussex, setting out the spatial strategy and strategic policies for the district to deliver sustainable development.

Economic viability – The financial feasibility of development.

Evidence base – The evidence that any Development Plan Document is based on. It is made up of the views of stakeholders and background research about the area.

Green infrastructure – A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Habitats Regulations Assessment (HRA) – An assessment of the potential effects of planning policies on European nature conservation sites.

Infrastructure – Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open spaces.

Infrastructure Delivery Plan (IDP) – Identifies infrastructure needed to support new homes and businesses over the Plan period.

Local Development Scheme (LDS) – A Local Development Scheme is required under section 15 of the *Planning and Compulsory Purchase Act 2004 (as amended)*. This document sets out the timetable for the preparation of Development Plan Documents which, when prepared, will comprise part of the Development Plan.

Local Economic Partnership (LEP) – Private/public sector partnerships that have a clear remit to drive sustainable private sector led growth. Mid Sussex is within the Coast to Capital LEP.

Local Nature Reserve (LNR) – Designated by the local authority and managed for either nature conservation or to provide recreational opportunities to communities.

Local Plan - A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In Mid Sussex this is known as the District Plan.

Monitoring Report – To support the Development Plan, the annual monitoring report assesses the implementation of the local development scheme and the extent to which policies in Development Plan Documents are being successfully implemented.

National Planning Policy Framework (NPPF) (2019) – The revised National Planning Policy Framework was updated on 19 February 2019 and sets out the government’s planning policies for England and how these are expected to be applied.

Neighbourhood Plans – A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood Development Plan in the Planning and Compulsory Purchase Act 2004.

Objectively Assessed Need (OAN) – The total amount of housing that would be needed to meet, as a minimum, expected levels of growth in population over the plan period.

Planning Practice Guidance – A web-based resource containing categorised planning guidance to accompany national planning policy.

Section 106 Agreement – A binding agreement between the Council and a developer on the occasion of granting a planning permission, regarding matters linked to the proposed development. Used to secure matters necessary to render planning applications acceptable by offsetting the costs of the external effects of development e.g. on local schools, which could not be secured through the imposition of planning conditions.

Section 278 Agreement – A binding agreement between the County Council and a developer used to secure necessary highway improvements to make development acceptable in planning terms.

Sites of Nature Conservation Importance (SNCI) – Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local Development Plan.

Sites of Special Scientific Interest (SSSI) – Areas identified by Natural England as being of special interest for their flora, fauna, or geological or physiographical features.

Special Area of Conservation (SAC) – Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Area (SPA) – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Statement of Community Involvement (SCI) – A document which sets out how the Council will engage communities on the preliminary stages of plan-making.

Strategic Access Management and Monitoring (SAMM) – A strategy setting out the measures that provide part of the mitigation for new residential development within 7km of the Ashdown Forest SPA. These measures focus on protecting the SPA from new recreational pressures through managing access (visitor) behaviour and monitoring both birds and visitors.

Strategic Flood Risk Assessment (SFRA) – An assessment by the District Council to inform the Local Development Framework of fluvial, surface water, groundwater, infrastructure and reservoir flood risks.

Suitable Alternative Natural Greenspace (SANG) – Green space that is of a quality and type suitable to be used as mitigation for the potential impact of development near the Ashdown Forest Special Protection Area.

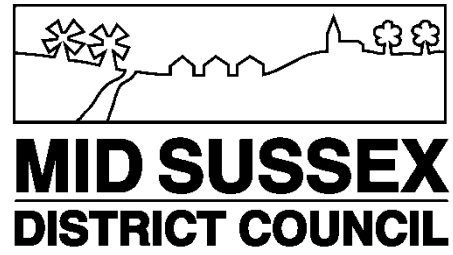
Supplementary Planning Documents (SPD) – These give further explanation and detail to policies in the Development Plan. They are subject to a statutory process including community involvement and sometimes a Sustainability Appraisal. SPDs are not subject to independent examination but require Council agreement before adoption.

Sustainability Appraisal – Sustainability Appraisal (incorporating Strategic Environmental Assessment (SEA)) is a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, economic and environmental factors). It is required under the Planning and Compulsory Purchase Act to be carried out on all Development Plan Documents and Supplementary Planning Documents.

Sustainable Development – At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable Drainage Systems (SuDS) – These are drainage systems designed to manage surface water and groundwater to sustainably reduce the potential impact of new and existing developments.

Mid Sussex



Site Allocations DPD
Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)

Non-Technical Summary

Regulation 19

July 2020

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Site Allocations DPD – Regulation 18 Sustainability Appraisal: Non-Technical Summary February 2020

What is Sustainability Appraisal and Strategic Environmental Assessment?

- 1.1. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”¹. It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:
- Social
 - Environmental
 - Economic

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 1.2. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires Development Plan Documents (DPDs) to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of the Site Allocations DPD – promoting sites, strategy or policy that is sustainable, and ruling out sites, strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Site Allocations DPD, whilst documenting how the plan meets the legal and policy requirements. The SA report also contains the elements required by the Strategic Environmental Assessment (SEA) directive as set out in the European Directive 2001/42/EC, adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.

The Sustainability Appraisal Report

- 1.3. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development of different options for site allocations in the Site Allocations DPD as well as any generic policies that the document may contain. The findings of this work have been taken into consideration in determining the content of the Site Allocations DPD and are documented within this report. This process will be repeated at all formal stages of the Site Allocations DPD.
- 1.4. The Sustainability Appraisal process, along with the Strategic Environmental Assessment process, has widened the range of issues and options considered in formulating the proposals for the Site Allocations DPD, in particular by focussing attention on the need to consider a range of potential social, economic and environmental effects. In turn, this has enabled the most sustainable policy approaches to be identified for inclusion within the Site Allocations DPD.

How to Comment on This Report

- 1.5. The Site Allocations DPD, along with the accompanying Sustainability Appraisal report, will be made available for public consultation for a period of 8 weeks. All comments received on both of these reports will be taken into consideration in preparing the final Plan to be submitted to the Secretary of State.

¹ The Report of the Brundtland Commission, 1987

1.6. If you wish to comment on these documents, these should be sent to:

Email:

LDFConsultation@midsussex.gov.uk

Online:

www.midsussex.gov.uk/SitesDPD

Post:

Planning Policy and Economic Development
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Site Allocations DPD

- 1.7. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The District Plan shapes the future of Mid Sussex by providing a framework for new development, employment growth, infrastructure, and measures to protect the countryside and other valuable assets. The District Plan was accompanied by its own Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to ensure the Plan was the most sustainable given all reasonable alternatives.
- 1.8. The Mid Sussex District Plan identified:
 - A total housing need of 16,390 homes for the period 2014-2031; inclusive of a contribution towards meeting unmet housing need in neighbouring authorities (policies **DP4: Housing** and **DP6: Settlement Hierarchy**)
 - Strategic Housing Allocations at Burgess Hill (**DP8 – DP9**), Hassocks (**DP11**) and Pease Pottage (**DP10**)
 - A total of 25ha employment space (policy **DP1: Sustainable Economic Development**).
- 1.9. Whilst the majority of the housing need has been planned for within the District Plan (either through completions, committed sites (those with allocations of planning permission) or the strategic sites listed above), there is a residual housing need.
- 1.10. Policy **DP4: Housing** identifies this 'residual need' and commits the Council to preparing a Site Allocations DPD in order to allocate sufficient sites to meet it. The DPD is also able to identify sites for other uses, such as employment, to meet any remaining need that was not identified within the District Plan.
- 1.11. The residual housing need figure has now been updated (as at 1st April 2020), and shows that the Site Allocations DPD will be required to plan for a minimum of 1,280 dwellings. The employment need position has also been updated, to take account of up-to-date employment forecasts and any changes since the District Plan was adopted. This work identifies a need for an additional 10-15ha of employment land.
- 1.12. The District Plan sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:
 - i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - iv) to set out additional Strategic Policies necessary to deliver sustainable development.
- 1.13. The purpose of the Site Allocations DPD is therefore to plan for a minimum of 1,280 dwellings and 10-15ha of employment land by allocating sufficient sites.

Methodology

- 1.14. To undertake a Sustainability Appraisal of the Site Allocations DPD, the council collected data about the district on social, environmental and economic issues. This is known as the 'baseline' and is documented in section 3 of the main report. This information enables the current (and potential future) social, environmental and economic issues facing the district to be established. The baseline consists of quantitative data as well as qualitative data – a

review of all plans, programmes and policies that impact upon the Site Allocations DPD was also established to form a picture of the issues and challenges facing the district.

- 1.15. From this information, it was possible to identify sustainability objectives that the emerging policy options within the Site Allocations DPD would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts from policies to be quantified and monitored in the future.
- 1.16. The report accompanied the Regulation 18 Site Allocations DPD and was subject to consultation. Comments received during the consultation have been considered in preparing this Regulation 19 report. This also builds upon an earlier 'Scoping Report' which set out the baseline and proposed objectives and indicators. In accordance with regulations, this document was subject to a 5-week consultation with statutory environmental bodies and their comments were taken into account when drafting the Regulation 18 Sustainability Appraisal.

Current Sustainability Issues

- 1.17. From the examination of the baseline data and plans, programmes and policies that could influence the Site Allocations DPD it was possible to identify the current sustainability issues faced by the district. These issues are summarised as follows:

Social

- an increasing population, and the need for additional infrastructure² capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- existing school capacity issues will need to be addressed
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged
- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the District mostly in relation to access to local community services – this can create social exclusion.
- low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

² Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open space.

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.
- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste. Recycling rates are increasing.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts on traffic and environmental quality. Whilst it is recognised that commuters make a significant financial contribution to the District, it is important that appropriate employment opportunities are promoted within the District to ensure people who live locally can work locally.
- The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained
- There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems.
- The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.

Sustainability Framework – Objectives and Indicators

1.18. By taking the above issues it was possible to identify sustainability objectives for the district. These objectives were used to assess how the various policy options (known as 'reasonable alternatives') being explored for the Site Allocations DPD would contribute to the objectives of sustainability. The set of indicators could also be used to devise a monitoring framework for assessing how the policy proposals affect the objectives upon adoption of the Site Allocations DPD.

1.19. A total of 16 Sustainability Objectives were devised:

SOCIAL

1	To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford
2	To improve the access to health, leisure and open space facilities and reduce inequalities in health.

3 To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.

4 To improve access to retail and community facilities.

5 To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities.

ENVIRONMENTAL

6 To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), thereby minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA)

7 To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.

8 To conserve and enhance the District's biodiversity. (SEA)

9 To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)

10 To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)

11 To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)

12 To increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal

13 To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)

ECONOMIC

14 To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.

15 To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.

16 To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.

Developing and Appraising Options – “Reasonable Alternatives”

- 1.20. In preparing the Site Allocations DPD, a number of options were considered, and a range of options for each policy area were identified – these are referred to in the guidance as ‘reasonable alternatives’. As the aim of the DPD is to allocate sufficient housing and employment sites in order to meet the identified need, the majority of the Sustainability Appraisal report focuses on the strategy options and site options for allocation. There are also a number of other policies, which have been identified as needed to support the allocation of sites. Reasonable alternatives for these have also been tested through the appraisal process.
- 1.21. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified.
- 1.22. The preferred policy option from all of the options appraised has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the ‘preferred option’. In order to record the sustainability of the varying options, a range of colours and symbols has been used:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
?	Uncertain or unknown impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

Table 1: Appraisal Impact scoring method

- 1.23. All of the reasonable alternatives have been appraised using these symbols, against the methodology outlined in section 2 of the main report. Once appraised, mitigation for any predicted negative impacts has been identified.
- 1.24. The majority of the Site Allocations DPD sites and policies were generally found to impact positively on the social, environmental and economic objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated by one of the policies within the adopted District Plan, or could be mitigated by including policy requirements on individual sites.

Appraisal of Reasonable Alternatives – Summary

1.25. A summary of the sustainability appraisal findings follows. The full appraisals can be found in the Sustainability Appraisal (main report) that accompanies the Site Allocations DPD.

Housing

Housing Requirement

1.26. The District Plan sets a housing requirement of 16,390. Since the Plan was adopted, housing completions and commitments (sites with planning permission or allocated e.g. within Neighbourhood Plans) have been updated to reflect the current position (as at 1st April 2020), including an up-to-date windfall projection.

1.27. The District Plan identified a residual housing need of 2,439 that needed to be allocated within the Site Allocations DPD. As a result of the updates to figures based on monitoring, the residual amount is now 1,280.

District Plan Minimum Requirement	16,390
Completions (2014/15 - 2019/20)	4,917
Total Housing Commitments (inc. strategic developments already with permission)	9,689
Windfall Allowance	504
Elsewhere in the district, as allocated through future Neighbourhood Plans and the Site Allocations DPD	1,280

Table 2: Residual Housing Requirement

1.28. In order to meet the District Plan requirement in full within the plan period 2014-2031, it is intended that the Site Allocations DPD should at least plan for the 'residual requirement', a minimum of **1,280** dwellings. In accordance with policy **DP4: Housing**, the residual requirement should be spatially distributed in general accordance with the established settlement hierarchy as set out in table 3.

Category	Settlement	Residual Requirement (DP6)	Category Residual Requirement
1 – Town	Burgess Hill	0	706
	East Grinstead	706	
	Haywards Heath	0	
2 – Larger Village	Cuckfield	198	198
	Hassocks	0	
	Hurstpierpoint	0	
	Lindfield	0	
	Copthorne	0	
	Crawley Down	0	
3 – Medium Sized Village	Albourne	36	371
	Ardingly	16	
	Ashurst Wood	0	
	Balcombe	18	
	Bolney	30	
	Handcross	0	
	Horsted Keynes	70	
	Pease Pottage	0	
	Sayers Common	15	
	Scaynes Hill	119	
	Turners Hill	60	
	Sharpthorne	4	
	West Hoathly	4	
	4 – Smaller Village	Ansty	
Staplefield		0	
Slaugham		0	
Twineham		5	
Warninglid		0	
	TOTAL	1,280	

Table 3: Residual Housing Requirement - Settlements

Housing Supply

- 1.29. The objective of the Site Allocations DPD is to allocate sufficient sites to meet the residual housing need identified in the District Plan (updated to reflect recent commitments and completions), and to allocate sites in locations that are compliant with the District Plan strategy set out in policies DP4/DP6. The Council has followed a logical, step-by-step process in order to arrive at a selection of sites to be appraised within this Sustainability Appraisal.
- 1.30. The process to arrive at reasonable alternatives for assessment within the Sustainability Appraisal was as follows:
1. **Call for Sites and preparation of SHELAA:** Following a ‘call for sites’ and Regulation 18 consultation a total of 253 sites were submitted to the Council. This forms the ‘pool’ of sites to choose from when preparing the Site Allocations DPD.
 2. **High Level Assessment (Site Selection Paper 1):** Sets out a methodology for removing sites that are non-compliant with the District Plan strategy, based on their size or their distance from existing settlements. A total of 94 sites were ruled out at this stage, leaving 158.
 3. **Detailed Assessment (Site Selection Paper 2):** Sets out a site selection methodology, incorporating 17 criteria by which potential sites would be assessed against. This was consulted upon with stakeholders.

- 4. Detailed Evidence Testing (Site Selection Paper 3):** Records the results of the assessment against the 17 criteria in Site Selection Paper 2. The 158 sites were assessed. Following assessment, 51 sites remain as having potential for allocation and should be subject to further evidence base testing and assessment. These sites performed well against the criteria and were consistent with the District Plan spatial strategy. They are deemed to be 'reasonable alternatives' for Sustainability Appraisal purposes.

1.31. Following assessment against the 17 sustainability criteria set out in the Sustainability Framework, the sites were categorised as follows:

Sites That Perform Well	These sites perform well individually, and relative to other sites within the same settlement. These sites, collectively, are therefore assessed as being compliant with the District Plan strategy.
Sites That Perform Poorly	These sites don't perform well against the sustainability objectives. There are a number of negative impacts that, it is concluded, would not be outweighed by positive impacts. These sites also don't perform well relative to other sites within the same settlement – i.e. there are more sustainable sites within the same settlement that would meet the residual housing requirement before these sites are required. These sites are therefore rejected at this stage, however they may need to be considered again in the future should circumstances change (e.g. increased housing requirement within the settlement, change in strategy, or withdrawal of other sites from the process).
Marginal	These sites perform well individually (positives generally outweigh negatives); however they are not necessarily the most sustainable sites within the settlement. The residual housing requirement can be met sufficiently by 'Sites That Perform Well'

Table 4: Site Appraisal Categories

1.32. The sites fall into the categories as follows. Detailed assessments and justification is set out in the Sustainability Appraisal Report.

SA	Cat	Settlement	SHELAA ID#	Site	Yield
Sites That Perform Well	1	Burgess Hill	345	St. Wilfrids Catholic Primary School, School Close, Burgess Hill	200
		Burgess Hill	594	Land South of Southway, Burgess Hill	30
		Burgess Hill	840	Woodfield House, Isaacs Lane, Burgess Hill	30
		Burgess Hill	904	Land to the south of Selby Close, Hammonds Ridge, Burgess Hill	12
		East Grinstead	196	Land south of Crawley Down Road, Felbridge	200
		East Grinstead	770	Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead	550
		East Grinstead	847	Former East Grinstead Police Station, College Lane, East Grinstead	22
		Haywards Heath	783	Rogers Farm, Fox Hill, Haywards Heath	25
	2	Crawley Down	519	Land north of Burleigh Lane, Crawley Down	50
		Cuckfield	479	Land at Hanlye Lane to the east of Ardingly Road, Cuckfield	55
		Hassocks	221	Land to the north of Shepherds Walk Hassocks	130³
	3	Ardingly	832	Land west of Selsfield Road, Ardingly	70
		Ashurst Wood	138	Land south of Hammerwood Road, Ashurst Wood	12

³ Note: This site has received planning consent, therefore 130 dwellings are counted as 'commitments' and will not be counted against Sites DPD supply, to avoid double counting.

SA	Cat	Settlement	SHELAA ID#	Site	Yield
		Handcross	127	Land at St. Martin Close, Handcross	65 ⁴
		Horsted Keynes	184	Land south of St. Stephens Church, Hamsland, Horsted Keynes	30
		Horsted Keynes	807	Land South of The Old Police House, Birchgrove Road, Horsted Keynes	25
		Sayers Common	829	Land to the north Lyndon, Reeds Lane, Sayers Common	35
		Scaynes Hill	897	Land to the rear Firlands, Church Road, Scaynes Hill	20
		Turners Hill	854	Withypitts Farm, Selsfield Road, Turners Hill	16
4	Ansty	644	Ansty Cross Garage, Cuckfield Road, Ansty	12	
Sites That Perform Poorly	1	Burgess Hill	4	Wintons Farm, Folders Lane, Burgess Hill	13
		Burgess Hill	646	The Garage, 1 Janes Lane, Burgess Hill	9
		East Grinstead	224	Land at Brooklands Park, west of Orchard Way, East Grinstead	15
		East Grinstead	595	Land at Brookhurst, Furze Lane, East Grinstead	7
		East Grinstead	763	Carpet Right, 220 - 228 London Road, East Grinstead	24
		Haywards Heath	618	MSDC Car Park, north of Oaklands Road	8
		Haywards Heath	988	Land to the north of Old Wickham Lane, Haywards Heath	60
	2	Cuckfield	227	Land to the north of Glebe Road, Cuckfield	84
		Cuckfield	567	Land to East of Polestub Lane, Cuckfield	120
		Hurstpierpoint	164	Land to the rear of 78 Wickham Hill, Hurstpierpoint	18
		Lindfield	983	Land at Walstead Grange, Scamps Hill, Lindfield	270
	3	Bolney	264	Land south of Ryecroft Road, Bolney	5
		Bolney	526	Land east of Paynesfield, Bolney	30
		Bolney	543	Land West of London Road (north), Bolney	81
		Bolney	741	Land to west of London Road, Bolney	24
		Horsted Keynes	216	Land at Police House Field, Birch Grove Road/Danehill Lane, Horsted Keynes	10
		Sayers Common	491	Land south of Furzeland Way, Sayers Common	12
		Sayers Common	613	Land at Whitehorse Lodge, Furzeland Way, Sayers Common	9
	Turners Hill	474	Land adjacent to 18 East Street, Turners Hill	6	
	Marginal	1	Burgess Hill	557	Land south of Folders Lane and east of Keymer Road, Burgess Hill
Burgess Hill			738	Land east of Greenacres, Keymer Road and south of Folders Lane	100
Burgess Hill			827	Land South of 96 Folders Lane, Burgess Hill	40
East Grinstead			998	Old Court House, Blackwell Hollow, East Grinstead	12
Haywards Heath			503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	630
2		Hassocks	210	Land opposite Stanford Avenue, London Road, Hassocks	45
		Hurstpierpoint	13	Land west of Kemps, Hurstpierpoint	114
		Hurstpierpoint	19	Land east of College Lane, Hurstpierpoint	165
		Sayers Common	830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	100

⁴ Note: This site has been partly allocated within the Slaugham Neighbourhood Plan (35 dwellings), therefore 35 dwellings are counted as 'commitments' and will not be counted against Sites DPD supply, to avoid double counting.

SA	Cat	Settlement	SHELAA ID#	Site	Yield
	4	Ansty	576	Land at Ansty Farm, Land north of The Lizard, (Site A), Cuckfield Road, Ansty	75
		Ansty	631	Challoners, Cuckfield Road, Ansty	10
		Ansty	784	Extension to allocated Land at Bolney Road, Ansty	45

	Total Sites	Total Yield
Perform Well	20	1,424
Perform Poorly	19	805
Marginal	12	1,536

Table 5: Site Assessment Summary

- 1.33. In total the sites appraised as performing well and therefore having potential for allocation would yield 1,424 dwellings. This represents an excess of 144 dwellings above the residual amount required of 1,280.
- 1.34. The allocation of the 20 sites that perform well represents the minimum level of growth required by the Site Allocations DPD. This represents the first 'Reasonable Alternative' approach to allocating sites, and should therefore be appraised.
- 1.35. Whilst there is a small over-supply of 144 units from the 20 sites, this is not considered to be a sufficient buffer should sites fall out of the allocations process between now and adoption (for example, due to delivery issues, reduction in yield, or any other reasons identified during consultation or the evidence base). Therefore it is sensible to look at alternative approaches which would deliver an increased number of dwellings, and therefore more robustness in overall supply at this stage.
- 1.36. Any additional supply should be drawn from the sites that were concluded as 'Marginal', as these performed relatively well in sustainability terms. The Settlement Hierarchy establishes that settlements within Category 1 are the most sustainable. Following a review of the marginal sites, it was concluded that, should additional sites be required, these should ideally be drawn from sites in the highest settlement category in the hierarchy. These sites perform well, and would mean focusing additional growth (beyond that required to meet the residual housing requirement) at the most sustainable locations using the most sustainable sites still in the process. These sites are:

Cat	Settlement	ID	Site	Yield
1	Burgess Hill	557	Land south of Folders Lane and east of Keymer Road, Burgess Hill	200
	Burgess Hill	738	Land east of Greenacres, Keymer Road and south of Folders Lane (formerly part of site 557)	100
	Burgess Hill	827	Land South of 96 Folders Lane, Burgess Hill	40
	East Grinstead	998	Old Court House, Blackwell Hollow, East Grinstead	12
	Haywards Heath	503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	630

Table 6: Marginal Sites at Category 1

- 1.37. The potential sites at Category 1 that could be allocated to supplement housing supply are therefore the Old Court House at East Grinstead, the combined sites at Folders Lane, Burgess Hill and Haywards Heath Golf Course, Haywards Heath.

- 1.38. Subsequent to the nomination of the Old Court House site at East Grinstead, the Council was advised that the site could no longer be assumed to be available for allocation in the Sites DPD. On this basis it was not possible to consider the site further for inclusion amongst the reasonable alternatives. This left only the combined sites at Folders Lane and Haywards Heath Golf Course as marginal sites to be considered for allocation.
- 1.39. It is not appropriate to allocate both of these sites as this would over-provide (as in total they would equate to 973 units) and would lead to a significant imbalance of sites to be delivered at Category 1. However, allocating the combined site at Folders Lane or the Golf Course would help supplement housing supply with a sufficient buffer over the residual required.
- 1.40. Assuming that the selection of 20 sites that performed well are 'constant', there are three reasonable alternatives to meeting the residual housing requirement in full with varying levels of contingency. The three reasonable alternative options are therefore:

Option	Sites	Total Supply	Additional Supply (above residual)
A	20 'Constant Sites'	1,424	+144
B	20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites)	1,764	+484
C	20 'Constant Sites' + Haywards Heath Golf Course	2,054	+774

Table 7: Site Options

Site Selection				
Reasonable Alternatives for Assessment				
Option A: 20 'Constant Sites'. 1,424 dwellings.				
Option B: 20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites). 1,764 dwellings				
Option C: 20 'Constant Sites' + Haywards Heath Golf Course. 2,054 dwellings.				
Objective	A	B	C	Assessment
1 - Housing	+	++	++	All options meet the residual housing requirement, therefore impact positively on this objective. Options (b) and (c) provide more certainty that housing need would be met, as they provide a healthy buffer above the minimum amount of development required. This provides a level of contingency should some sites not be delivered as expected (either in entirety, or with a reduced yield).
2 - Health	+	++	+	The 20 constant sites have been selected according to their consistency with the spatial strategy, focusing on higher tier settlements. The collection of sites is largely well connected to health, education and retail facilities. Option (b) performs more positively against these objectives, as the sites at Folders Lane are in close proximity to each of these facilities.
3 - Education	+	++	+	
4 - Retail	+	++	+	
5 - Communities	+	+	+	All options would provide sufficient housing, spread across the district according to the settlement hierarchy and District Plan strategy. This enables families to grow in areas where need is derived from, helping existing communities to grow.
6 - Flood Risk	0	0	0	None of the options are likely to have any negative

				impacts on flood risk. All sites selected will need to ensure there is no risk from flooding.
7 - Land Use	-	-	--	All options would involve significant development on greenfield sites, and are therefore likely to have negative impacts on this objective. In particular, the yield associated with option (c) is likely to have a greater impact on this objective.
8 - Biodiversity	?	?	-	Options (a) and (b) include sites that may have a negative impact on biodiversity, although policy requirements for mitigation should reduce any negative impacts. Option (c) in particular includes a site that contains ancient woodland and is adjacent to a designated Local Wildlife Site; although these could be mitigated there is a higher prospect of negative impacts upon this objective.
9 - Countryside	-	-	-	Whilst some sites have a greater impact on landscape and designated areas (AONB) than others, each have been assessed as having 'low impact' overall. There are no significant differences between the three options on this objective.
10 - Historic	?	?	?	There are no negative impacts expected from any of the three options.
11 - Transport	?	?	?	There are no 'severe' highways impacts expected from any of the three options. Policy requirements could ensure access or highways mitigation is provided to ensure no severe impacts arise.
12 - Energy/Waste	-	-	-	All options will increase the amount of waste generated, albeit that sustainable construction techniques can be utilised and waste recycling will be employed to minimise any impacts. There are no significant differences between the three options.
13 - Water	-	-	-	All options will increase demand on water supply and for wastewater treatment. There are no significant differences between the three options.
14 - Regeneration	+	++	+	Option (b) performs more positively against this objective, as the sites at Folders Lane are in close proximity to the town centre.
15 - Employment	+	+	+	All options would provide sufficient housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	++	++	All options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon. Additional population increases (i.e. options (b) and (c)) within the district will have positive knock-on effects for local businesses, retail, and entertainment and community facilities, supporting economic growth.

Summary of Appraisal:

All three options would meet the residual housing need; therefore perform positively in relation to the housing objective. Options (b) and (c) allow for more growth than needed, therefore provide more certainty that the housing need will be met.

The 20 'constant' sites have been selected due to their performance against the sustainability objectives, but also their consistency with the spatial strategy. In terms of the social objectives, all options are largely positive as they involve focussing growth to settlements higher in the settlement hierarchy – where the majority of facilities and services exist. Option (b) in particular involves the development south of Folders Lane, which is largely within 15 minutes' walk of Burgess Hill town centre, health facilities and a primary school. This also has positive impacts on the objective concerned with encouraging town and village centre regeneration, due to its close proximity to the town centre. Haywards Heath Golf Course (associated with Option (c)) is distant from existing services and facilities.

<p>All options are likely to have negative impacts on the environmental objectives. This is inevitable due to the conflict between preserving the environment and building, the majority of which are greenfield sites. However, mitigation could be provided to minimise impacts on landscape, biodiversity, heritage and transport. Option (c) however proposes significantly more development on greenfield land and is likely to have more negative impacts on biodiversity due to the presence of ancient woodland within the Golf Course site, and its adjacency to a Local Wildlife Site.</p> <p>Options (b) and (c) are more likely to have positive impacts on economic growth objectives due to their higher yield than option (a).</p>	
<p>Cross-Border Impacts:</p>	
<p>The majority of sites will have no impact cross-boundary, however some sites proposed are located close to the District and County boundary (notably in the north of the district, adjacent to Tandridge). Any impacts are likely to be confined to transport matters, which are tested within the Mid Sussex Transport Model. Any impacts from these sites will be discussed with the relevant authority.</p>	
<p>Recommendations and Mitigation Measures :</p>	
<p>There are a number of negative environmental impacts expected to arise as a result of all three options, which is inevitable due to the conflict between preserving the environment and housebuilding. Mitigation measures should be required within the policy requirements for each site, and should be assessed on a site-by-site basis based on the detailed information provided for each site, and its individual assessments.</p>	
<p>Preferred Option:</p>	<p>B</p>

1.41. Following the assessment of all reasonable alternative options for site selection, the preferred option is option B. Although option A would meet residual housing need, option B proposes a sufficient buffer to allow for non-delivery, therefore provides more certainty that the housing need could be met. Whilst option C also proposes a sufficient buffer, it is at the expense of negative impacts arising on environmental objectives. The level of development within option C is approximately 60% above the residual housing need, the positives of delivering an excess of this amount within the Site Allocations DPD is outweighed by the negative environmental impacts associated with it.

Employment

1.42. District Plan policy DP1: Sustainable Economic Development sets out the adopted position relating to employment need. This states that the number of jobs expected to arise as a result of increased housebuilding was 543 jobs per annum, therefore closely matching the 521 jobs per annum anticipated through forecasting. The policy also allocated 25ha of employment land at Burgess Hill, on a site now known as “The Hub”.

1.43. In response to updated employment forecasting, changes in the employment market and changes to national policy, the Council commissioned an update to the employment need evidence. Site Selection Paper 4: Employment describes the methodology and processes followed.

1.44. This work has shown that an additional **10-15ha** of B-Class employment land is required above the amount identified and allocated within the District Plan (a range is provided due to some of the assumptions made, therefore the Site Allocations DPD should aim to supply towards the top of the range). This is a separate requirement to the proposed Science and Technology Park, the broad location of which is identified in District Plan policy DP1.

Employment Strategy

1.45. Three potential strategies for meeting employment need have been considered. These represent reasonable alternatives for assessment in the Sustainability Appraisal, and are appraised below:

A: Allocate sufficient 'new' employment sites to meet the 10-15ha

B: Meet the need in part through allocating 'new' sites and relying on 'windfall' from expansion/redevelopment/intensification of existing sites to meet the remainder

C: 'Do Nothing' i.e. solely rely on the Science and Technology Park to meet any remaining need (as well as contributing to wider regional need).

Appraisal Conclusion
<p>There are a number of positive benefits expected for all three options as they all involve providing more land for employment purposes, encouraging economic growth and the potential for businesses to grow.</p> <p>However, there is more certainty with option (a). This option would involve identifying sufficient land for employment uses to meet the identified need of 10-15ha. The Site Allocations DPD can therefore clearly demonstrate that there is sufficient employment land in the district, and through the Site Selection and Sustainability Appraisal process can ensure the most suitable and sustainable sites are selected to meet this need.</p> <p>Option (b) would provide less certainty as it relies on windfall, by its nature there is no certainty as to where additional land will be provided, to what extent, and no certain timescale. It could mean that the need of 10-15ha isn't met by the end of the plan period, leading to an unmet need for employment land.</p> <p>Option (c) relies on the Science and Technology Park (assessed separately within the Sustainability Appraisal). This use is for a wider, strategic regional need rather than to meet local needs.</p>
Preferred Option: A

[Table 8: Employment Strategy - Summary](#)

1.46. The preferred option is to allocate sufficient sites to meet the 10-15ha employment need. The following sections describe the site selection process undertaken to identify sites to meet this need.

Employment Site Selection

- 1.47. Following a 'call for sites' and Regulation 18 consultation, a total of 24 potential employment sites were promoted to the Council, and published in the SHELAA. An assessment of these was undertaken following the same approach outlined in Site Selection Paper 2, whereby the sites were assessed against 19 employment related criteria.
- 1.48. Following the site assessment work, and upon analysing the various sites that had been submitted, it has been concluded that the site options fit into three broad spatial categories:
- Small extensions at Bolney Grange
 - Large sites in the vicinity of the A2300, Burgess Hill
 - 'Other' smaller sites spread across the district

'At Bolney Grange'	'A2300 Vicinity'	'Other'
24 - Land at Stairbridge Lane (South of Bolney Grange), Bolney (5.5ha)	602 - Land at Northlands Farm, A2300/A23, Hickstead (7.25ha)	192 - Pease Pottage Nurseries, Brighton Road, Pease Pottage (1ha)
906 - Undeveloped land (south) at Bolney Grange Business Park Stairbridge Lane Bolney (0.6ha)	946 - Northlands Farm, Stairbridge Lane, Bolney (14.5ha)	665 - Hangerwood Farm, Foxhole Lane, Bolney (9.2ha)
907 - Undeveloped land (east) at Bolney Grange Business Park Stairbridge Lane Bolney (0.2ha)	947 - Land between A2300 and Jobs Lane, Bolney (2.04ha)	826 - Burnside Centre, Victoria Road, Burgess Hill (0.96ha)
931 - Extension (east) to Bolney Grange Business Park Stairbridge Lane Bolney (0.7ha)	948 - Land south of A2300 adjacent to Pookbourne Lane (10ha)	864 - Marylands Nursery, Cowfold Road, Bolney (2.4ha)
		865 - Bolney Nursery, Cowfold Road, Bolney (0.8ha)
		888 - Cedars (Former Crawley Forest School) Brighton Road Pease Pottage (2.3ha)
		912 - Site of Former KDG Victoria Road Burgess Hill (1.1ha)
		913 - The Walled Garden, behind the Scout Hut, London Road, Balcombe (0.3ha)
		915 - Area south of Redbridge Lane at junction with London Road, Balcombe (1.2ha)
		940 - Land north of the A264 at Junction 10 of M23 (Employment Area) (2.7ha)
		991 - Extension to Silverwood Copthorne (10-15ha)
		994 - Friday Farm Copthorne (2.08ha)
		996 - Extension to Barn

		Court Copthorne (3.73ha)
		999 - Additional employment land north of A264 Copthorne (3.5ha)
		1005 – Land at Hazeldene Farm, north of Orchard Way, Warninglid (2.9ha)
		1007 – Crawley Down Garage (5.44ha)

Table 9: Employment Sites - Categories

1.49. These three broad spatial options represent reasonable alternatives for assessment in the Sustainability Appraisal, in order to determine the most sustainable approach to allocating additional employment sites.

- A:** Small extensions at Bolney Grange
- B:** Large sites in the vicinity of the A2300, Burgess Hill
- C:** 'Other' smaller sites spread across the district

Appraisal Conclusion
Options (a) and (c) perform positively against the social and economic objectives as they would encourage existing business to grow as well as encouraging new business use across the district.
Whilst option (b) would also encourage new business to the district, this is located in one area (on the edge of Burgess Hill) and would not provide well-needed employment land in other locations – noting that the District Plan strategy involves housing growth at nearly all settlements within the district according to the settlement hierarchy (District Plan policies DP4/DP6) and employment opportunities should be provided to match, where possible.
In particular, the location of the sites within option (b) are likely to have negative impacts on the transport objective due to their proximity to the already adopted strategic site (Northern Arc), location for a Science and Technology Park and significant employment allocation in the District Plan (The Hub, currently under construction).
Preferred Option: A / C

Table 10: Employment Strategy - Conclusion

1.50. There are no negative impacts expected from either option A or C. As one of the objectives of the District Plan is to encourage economic growth as well as allowing existing businesses to expand, it is proposed that both options would assist in meeting this objective. Therefore, both options are proposed within the Site Allocations DPD.

1.51. As a result of the above appraisal, the various sites categorised as 'other' are appraised individually within the Main Report to ensure the most suitable and sustainable sites are selected for allocation alongside the collection of small-scale expansions at Bolney Grange. Sites highlighted in green are those that performed well against the sustainability objectives and are proposed for allocation in the DPD. The full appraisal of these sites can be found in the Main Report.

Ref	Site	SHELAA	Area (ha)
A	Pease Pottage Nurseries, Brighton Road, Pease Pottage	192	1
B	Hangerwood Farm, Foxhole Lane, Bolney	665	9.2
C	Burnside Centre, Victoria Road, Burgess Hill	826	0.96
D	Marylands Nursery, Cowfold Road, Bolney	864	2.4
E	Bolney Nursery, Cowfold Road, Bolney	865	0.8
F	Cedars (Former Crawley Forest School) Brighton Road Pease Pottage	888	2.3
G	Site of Former KDG Victoria Road Burgess Hill	912	1.1

H	The Walled Garden, behind the Scout Hut, London Road, Balcombe	913	0.3
I	Area south of Redbridge Lane at junction with London Road, Balcombe	915	1.2
J	Land north of the A264 at Junction 10 of M23 (Employment Area)	940	2.7
K	Extension to Silverwood Copthorne	991	10-15
L	Friday Farm Copthorne	994	2.08
M	Extension to Barn Court Copthorne	996	3.73
N	Additional employment land north of A264 Copthorne	999	3.5
O	Land at Hazeldene Farm, north of Orchard Way, Warninglid	1005	5.44
P	Crawley Down Garage	1007	2.9

Table 11: Employment Sites Conclusion

Science and Technology Park

- 1.52. District Plan policy **DP1: Sustainable Economic Development** identifies a broad location to the west of Burgess Hill for a Science and Technology Park (S&TP). The feasibility and potential for a new S&TP was examined in the Burgess Hill Employment Sites Study and potential locations examined in more detail within the S&TP Potential Locations Assessment.
- 1.53. The Burgess Hill Employment Sites Study concluded that the potential for and feasibility of a S&TP should be investigated further. However at a high level, it confirmed the scale and nature of the potential market and alignment to aims of the Local Enterprise Partnership (LEP), Gatwick Diamond and City Deal strategies.
- 1.54. During the District Plan process and initial work on the broad location, there was a single site option presented to the Council – site #801 “Land at Dumbrell’s Farm, south of the A2300”. As this was the only option presented to the Council within the environs of the broad location identified, and no other options were presented within the rest of the district, this site was used as a proxy for the assessment work that accompanied the District Plan.
- 1.55. As part of the Council’s ‘Call for Sites’ exercise for the SHELAA, a second option was presented to the Council – site #949 “Land to the north of A2300”. Both sites are of a similar size, approximately 50ha, and propose comparable levels of employment. They are therefore both considered as Reasonable Alternatives for assessment in the Sustainability Appraisal.

Science and Technology Park – Site Options			
Reasonable Alternatives for Assessment			
Option A: SHELAA #949 “Land to the north of A2300”			
Option B: SHELAA #801 “Land at Dumbrell’s Farm, south of the A2300”			
Objective	A	B	Assessment
1 - Housing	0	0	There are no direct impacts expected against this objective.
2 - Health	0	0	There are no direct impacts expected against this objective.
3 - Education	+	+	Both sites propose links to educational establishments in order to provide opportunities for people to work once leaving school, college or university.
4 - Retail	+	+	Both sites include an element of small-scale retail and community facility provision (convenience store/café/crèche/etc) on-site as an ancillary use to the employment provision, for the benefit of workers on-site and those living locally.
5 - Communities	+	?	Option (a) proposes pedestrian and cycle links directly to the adjacent Northern Arc strategic site, therefore providing a better linkage to this area than option (b) .
6 - Flood Risk	-	--	Option (a) includes a small area of flood risk within its northern boundary, although this is likely to be avoided. Option (b) includes a similar amount of flood risk on its southern boundary, although quite a significant area within the western section of the site.
7 - Land Use	-	-	Both sites propose significant use of greenfield land, therefore are likely to have a negative impact on this objective.
8 - Biodiversity	-	--	Due to their scale and greenfield location, both sites are likely to impact negatively on biodiversity and appropriate mitigation must be provided. In particular, option (b) has large areas of ancient

			woodland and accompanying 15m buffer within the site boundary.
9 - Countryside	-	-	Both sites propose significant use of greenfield land, therefore are likely to have a negative impact on this objective. Both options propose landscape mitigation to minimise the impact of the development on the wider landscape.
10 - Historic	0	0	There are no impacts expected against this objective as there are no listed buildings/conservation areas likely to be impacted by these options.
11 - Transport	?	-	Both sites involve significant development which would be accessed by the A2300. Both schemes have proposed an access arrangement – whilst further work will be required to confirm final designs and capacity of these arrangements, option (a) proposes access via an upgrade to an existing roundabout, whereas option (b) proposes an additional junction. The addition of a further junction is more likely to have a negative impact on traffic flow on the A2300 and could cause knock-on delays at other junctions. The Mid Sussex Transport Model anticipates fewer ‘severe’ impacts on junctions for option (a) than (b) .
12 - Energy/Waste	+	?	Whilst both options propose green technologies and sustainable energy use, option (a) includes a currently permitted solar farm within the same ownership.
13 - Water	?	?	Both options are likely to increase water usage, although sustainable measures should be in place to minimise impact on this objective.
14 - Regeneration	++	++	Both options are likely to encourage regeneration of town and village centres due to their size, and the potential for the associated workforce to use the facilities, particularly within Burgess Hill Town Centre.
15 - Employment	++	++	Both options will provide significant employment opportunities close to planned development at Burgess Hill, enabling the workforce to live and work in close proximity therefore reducing the need to out-commute.
16 - Ec. Growth	++	++	Both options will contribute to economic growth by providing significant employment land, and encouraging high-value businesses to locate to Mid Sussex.
Summary of Appraisal:			
<p>Both sites will provide significant employment opportunities for the local workforce, as well as meeting employment needs on a wider, regional basis due to the uses proposed. The broad location of a Science and Technology Park was established within the District Plan (DP1) and the benefits of the principle were examined and approved during this process. Whilst both sites are in close proximity, there are a few differences between the two.</p> <p>The main differences relate to the environmental sustainability objectives.</p> <p>Option (b) includes significant areas of flood risk and ancient woodland, whereas option (a) does not. These areas would need to be avoided and mitigated as appropriate, which may reduce the developable area of the site.</p> <p>Of greater significance is the impact on the transport objective. Whilst both sites are likely to increase the level of highways movements on the network, and will be subject to further testing ahead of submission, it is anticipated through the Mid Sussex Transport Model that there will be fewer ‘severe’ junction impacts for option (a) compared to (b). Likewise, the access arrangements proposed for option (a) are favourable compared to (b) due to their potential to have less harmful impact on traffic flow on the A2300. These elements will be subjected to further testing.</p>			
Cross-Border Impacts:			
None expected.			

Recommendations and Mitigation Measures :	
Negative impacts are expected on land use, countryside and biodiversity objectives. Policy requirements should ensure that any negative impact on these is minimised, by requesting sufficient mitigation.	
Preferred Option:	A

1.56. In sustainability terms, site option A “Land to the north of A2300” performs more positively against the objectives than option B, particularly related to transport. Site Selection Paper 4: Employment details the thorough site selection process, which includes non-sustainability considerations, that has taken place to determine the preferred option.

Generic Policies

1.57. The Site Allocations DPD also intends to contain a number of generic policies. These have been identified as a result of monitoring District Plan policies, or as supplementary to the proposed housing and employment allocations to facilitate delivery. The following policy areas are proposed, and are appraised in full within the Main Report:

- Existing Employment Sites
- Safeguarding of Land for and Delivery of Strategic Highway Improvements
- Wivelsfield Railway Station
- Burgess Hill / Haywards Heath Multifunctional Network
- Air Quality

Policy	Conclusion
<p>Existing Employment Sites</p> <p>Option (a): To have a policy that supplements District Plan Policy DP1: Sustainable Economic Development by providing additional policy requirements relating to the protection of existing employment sites, whilst supporting their expansion where appropriate.</p> <p>Option (b): To not have this policy, and therefore rely on District Plan Policy DP1: Sustainable Economic Development.</p>	<p>As there is a current District Plan policy in place to protect existing employment sites, both options are similar in their appraisal and have mostly positive impacts on the sustainability objectives. By having a new policy in the Site Allocations DPD (option (a)), which defines such areas on the proposals map and sets a criteria about what development is appropriate within, adjacent to or within the vicinity of these sites, a more robust policy framework is in place to protect and allow for appropriate expansion of these important sites.</p> <p>The more robust policy provided by option (a) explains the greater number of significantly positive scores in comparison to option (b), particular on environmental and economic sustainability objectives which have a more direct link to the proliferation of employment sites in the District. In terms of the social sustainability objectives, both options have a likely positive impact, though it is somewhat difficult to quantify the effect of each option on social objectives.</p> <p>Preferred Option: A</p>
<p>Safeguarding of Land for and Delivery of Strategic Highway Improvements</p>	<p>As there is a current District Plan policy in place which provides transport-related requirements for development, both options are similar in their</p>

Policy	Conclusion
<p>Option (a): To have a policy that supplements District Plan Policy DP 21: Transport by providing an additional policy to safeguard land to support the delivery of transport schemes, identified in relation to the Site Allocations DPD, to ensure that proposed development is sustainable.</p> <p>Option (b): To not have this policy, and therefore rely on District Plan Policy DP 21: Transport.</p>	<p>appraisal and have mostly positive impacts on the sustainability objectives. By having a new policy in the Site Allocations DPD (option (a)), which safeguards areas on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect these important sites.</p> <p>The more robust policy provided by option (a) explains the greater number of significantly positive scores in comparison to option (b), particularly on economic sustainability objectives which have a more natural benefit to be had from highways improvements. Both options also have a likely positive impact on social sustainability objectives, not because they increase provision but because they increase accessibility to local facilities. There are also positive impacts to be had by option (a) in relation to environmental sustainable objectives; option (b) has a negative impact on the land use objective because without the proposed new policy, the identified land is at risk of inappropriate development.</p> <p>Preferred Option: A</p>
<p>Wivelsfield Railway Station</p> <p>Option (a): To have a policy which safeguards Land to the west of Wivelsfield Railway Station to support the delivery of a package of improvements at Wivelsfield Railway Station.</p> <p>Option (b): To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.</p>	<p>There is nothing in the current Development Plan which provides a specific policy for Wivelsfield Railway Station. Without the proposed new policy, there is unlikely to be severe negative impacts across the board, but there are a few notable negative impacts should the Development Plan proceed without a new policy (option (b)). Particularly in terms of land use and transport objectives, there is a risk that without a new policy, the site could be developed for inappropriate uses.</p> <p>By having a new policy in the Site Allocations DPD (option (a)), which safeguards land at Wivelsfield Railway Station on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect this important site.</p> <p>The robust policy provided by option (a) explains the greater number of positive impacts in comparison to option (b), particularly on economic sustainability objectives where there are likely to be positive impacts to be gained from improvements to strategic sustainable transport links. This too has a positive impact on the transport sustainability objective.</p> <p>Preferred Option: A</p>
<p>Burgess Hill / Haywards Heath</p>	<p>There is nothing in the current Development</p>

Policy	Conclusion
<p>Multifunctional Network</p> <p>Option (a): To have a policy for the Burgess Hill/ Haywards Heath Multifunctional Network which supports the delivery of a programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill.</p> <p>Option (b): To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.</p>	<p>Plan which provides a specific policy for Burgess Hill/ Haywards Heath Multifunctional Network. Without the proposed new policy, there is unlikely to be severe negative impacts across the board, but there are a few notable negative impacts should the Development Plan proceed without a new policy (option (b)). There is a risk that without a new policy, the identified areas could be developed for alternative uses.</p> <p>By having a new policy in the Site Allocations DPD (option (a)), which provides policy on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect this important site.</p> <p>Option (a) has multiple positive sustainability impacts; the introduction of a multifunctional network between Haywards Heath and Burgess Hill could bring social, environmental and economic benefits. However, this option could negatively impact upon the sustainable objective for the countryside, as it could bring potentially harmful development to what is currently, mostly open countryside. Nonetheless, the impact should be low because development is likely to constitute little more than a foot/cycle/bridle path that is also likely to improve access to and enjoyment of the countryside.</p> <p>Preferred Option: A</p>
<p>Air Quality</p> <p>Option (a): To have a policy that supplements District Plan Policy DP29: Noise, Air and Light Pollution by providing additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs. It also addresses potential air quality impacts for the Ashdown Forest SPA and SAC.</p> <p>Option (b): To not have this policy, and therefore rely on District Plan Policy DP29: Noise, Air and Light Pollution.</p>	<p>In protecting residents' quality of life from unacceptable levels air pollution, option (a) and (b) have many positive impacts on the social and environmental sustainability objectives, though have no identified impact on the economic objectives.</p> <p>There are no identified negative impacts should the Development Plan proceed without a new policy about air quality, however, there a more significantly positive impacts to be had should a new policy be introduced through the Site Allocations DPD.</p> <p>By providing additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs, and addressing potential air quality impacts for the Ashdown Forest SAC (where air quality is a factor), option (a) provides a more robust policy framework than option (b) to ensure that any negative impact of new development on air quality is minimised and appropriately mitigated when necessary.</p>

Policy	Conclusion
	Preferred Option: A

Table 12: Generic Policies- Conclusions

Sustainability Appraisal - Conclusion

- 1.58. The Sustainability Appraisal concludes that the majority of the site options chosen for allocation impact positively on the social and economic objectives. Where a negative sustainability impact has been identified, it is to be mitigated against through site specific policies, or in some cases, is indicative of an inevitable conflict between allocating land for housing and protecting the environment (as described in the Main Report).
- 1.59. In particular, positive impacts are expected to arise for the sustainability objectives related to housing and employment. This is because the Site Allocations DPD is proposing to meet the residual need for both of these in full, with a sufficient buffer to improve the robustness of supply. Therefore, these objectives should be met by the collection of sites chosen for allocation.
- 1.60. The sites chosen in themselves represent the most sustainable reasonable alternatives. Arriving at the preferred sites has involved a thorough site selection process to remove sites that are not compliant with the District Plan strategy (which itself was appraised in the Sustainability Appraisal accompanying the plan), assessment against a number of criteria, and finally an assessment against the sustainability framework. This has ensured that the sites selected are the best sites in deliverability and sustainability terms. This process relates to both housing and employment sites, as well as the Science and Technology Park. Further information on the full process is reported in Site Selection Paper 3: Housing and Site Selection Paper 4: Employment.

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Habitats Regulations Assessment of the Mid
Sussex Site Allocations Development Plan
Document at Draft Submission Plan Stage
(Regulation 19) – March 2020.

Non-technical summary

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Non-technical Summary

This report is the Habitats Regulations Assessment (HRA) of the Mid Sussex Site Allocations Development Plan Document (DPD) at the Regulation 19 stage. This HRA report has been prepared by Footprint Ecology on behalf of Mid Sussex District Council. HRA is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. European sites include Special Protection Areas (SPAs), which are classified for their bird populations of European interest, and Special Areas of Conservation (SACs), which are designated for habitats and species of European interest. The legislation sets out a clear step by step approach for decision makers considering any plan or project.

The Site Allocations DPD is part of the Mid Sussex Development Plan, with the District Plan having already been adopted in 2018. The Site Allocations DPD provides the sites necessary to deliver the growth set out within the District Plan, alongside the strategic allocations in the adopted District Plan, which has similarly been through the HRA process.

HRA Process

Due to the close proximity, known potential risks, and current development of measures to mitigate for potential impacts, Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) is the primary focus of the HRA work. The first stage is a screening stage, whereby each aspect of the plan is checked to establish whether there are any risks to the European sites. The HRA identifies 'impact pathways' i.e. any means by which there might be an impact on the European site from the plan content and its future implementation. Any identified likely significant effects, or where there is uncertainty, leads to the appropriate assessment stage. This is a more detailed analysis of the nature of the potential risks and what the consequences may be for the habitats and/or species that are interest features of the European sites. The key impact pathways are discussed below, with recreation impacts primarily relating to risks to SPA features, and air quality impacts primarily relating to risks to SAC features.

Air Quality

Mid Sussex District Council has recognised the potential for growth within the emerging Mid Sussex Site Allocations DPD to have air quality implications for Ashdown Forest and has appointed specialist consultants to assist with the consideration of potential impacts. Reductions in air quality through increased Nitrogen deposition associated with increased traffic can impact on sensitive vegetation communities, leading to habitat deterioration.

The transport consultants, Systra have modelled predicted traffic changes as a result of proposed growth scenarios. The air quality consultants, Wood have then used the traffic modelling to undertake modelling of the predicted resultant changes in atmospheric pollutants, and Footprint Ecology is using the air quality modelling to inform this HRA. A number of growth scenarios (reflecting development in Mid Sussex and neighbouring authorities) have gone through this process. Each scenario has used the same model and Wood have predicted air pollutant increases as a result of the growth scenarios modelled for transect points on roads through and in close proximity to Ashdown Forest.

It is recognised practice that a breach of the critical loads that is greater than 1% is considered to be a likely significant effect for HRA purposes. This is standard practice for HRA of plans and projects, enabling potential risks to be assessed further to establish whether adverse effects on European sites can or cannot be ruled out.

The combined effect of Mid Sussex growth with that of neighbouring local planning authorities is such that critical loads (identified by a national data source) of pollutants are breached at some transect points. These are all points in close proximity to the road, where background loads are already relatively high. The modelling indicates that Nitrogen will be under the maximum critical threshold for all modelled points greater than 10m away from the road under all growth scenarios. It is concluded that this constitutes a likely significant effect, for all growth scenarios modelled, i.e. it is concluded that the air quality impact pathway requires appropriate assessment.

The 'Sites DPD' growth scenario reflects the growth proposed in the DPD at the Regulation 19 stage. It does not present air quality impacts that are significantly higher than other growth scenarios, and includes additional measures in terms of highways improvements that will serve to improve the functioning of the road network and reduce congestion. It is apparent from the modelling results that these improvements are likely to be making a small but positive contribution to reducing the air quality impacts of new growth. It is therefore concluded that the highways improvements are likely to be an important mitigation measure for air quality impacts.

The modelling results for the growth scenarios are such that the breaches of 1% of the critical loads are so low that, having regard for the wider context, they are considered to be a minor retardation low enough to rule out adverse effects on integrity, as a result of the development within Mid Sussex and neighbouring authorities. This conclusion is drawn with consideration of the beneficial influence of a number of factors set out within the appropriate assessment, and with reference to relevant evidence, case law and expert opinion, including advice sought from Natural England.

The factors considered are the long-term trajectory of air quality improvement and the scientific basis of those predictions, and consideration of other wider measures relating to Ashdown Forest that are likely to come forward.

Recreation

Mid Sussex District Council, with neighbouring authorities, has established a collaborative approach to assessing and mitigating for recreation impacts on Ashdown Forest. Additional residential development can bring more access pressure to Ashdown Forest, bringing disturbance to species and damage to habitats through trampling, erosion or nutrient enrichment, and previous HRA work has highlighted the need to take a strategic approach to managing additional access.

Evidence has been used to establish a zone of influence for recreation pressure (a zone within which it is deemed from available evidence that new development will contribute towards adverse effects on the protected site in the absence of mitigation). This zone extends into Mid Sussex District, and is used by the local planning authorities to determine the area where additional growth that brings further recreation pressure to Ashdown Forest will need to be mitigated. The strategic approach has been developed with available evidence and is supported by Natural England as the statutory nature conservation body.

This HRA of the Site Allocations DPD assesses the current progress of strategic mitigation and whether the mitigation approach can contribute to supporting the forthcoming site allocations. A package of mitigation measures, to manage recreation is primarily provided for through developer contributions funding as new development comes forward. This money is used to provide access management that is delivered either on-site (i.e. managing access on the European site) or off-site (i.e. providing alternative greenspaces for recreation that provide a similar experience and offer good visitor facilities in response to identified need).

This HRA for the Site Allocations DPD checks the current progress in developing a SANGs approach within the District. A strategic SANG is in place at East Court and Ashplats Wood in East Grinstead. This SANG has provided the off-site mitigation for residential development coming forward since January 2015, and with permissions given to date, is now nearing capacity based on SANGs good practice in terms of the number of new residents per ha of SANG provided.

New SANG options are proposed and are considered to present a viable option for additional SANG capacity to meet the growth provided for by the site allocations. SANG provision should be plan led so that there is certainty that there will be SANG capacity provided alongside new housing growth. The SANG is secured in policy wording.

Conclusions

This HRA uses evidence-based justifications to rule out adverse effects in relation to the key impact pathways, notwithstanding the fact that a HRA report is not complete until the final plan is checked prior to adoption. At this point in time, it is concluded that the Mid Sussex Site Allocations DPD does not present any potential risks to European sites that it is considered are not capable of being mitigated for. Adverse effects on integrity

on Ashdown Forest SAC/SPA, relating to air quality and recreation impacts can be ruled out.

Site Allocations DPD

Community Involvement Plan (CIP) – July 2020



For the:

- Mid Sussex Site Allocations Development Plan Document (Regulation 19)
- Sites DPD Sustainability Appraisal
- Sites DPD Habitats Regulations Assessment
- Sites DPD Equality Impacts Assessment

1. Background

The Site Allocations Development Plan Document (Sites DPD) is a daughter document to the Mid Sussex District Plan, which was adopted in March 2018. The District Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved, covering the period up to 2031. The District Plan sets out the district's housing and employment requirements. Whilst the majority of this requirement has already been planned for, there is still a remaining (residual) need that must be found – the role of the Sites DPD is to allocate sufficient housing, employment and other sites in order to ensure the need identified in the District Plan is met.

Community Involvement plays a vital role in the preparation of Development Plan Documents. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, there are two formal consultation periods for DPDs:

- Regulation 18: Preparation of a Local Plan
- Regulation 19: Publication of a Local Plan (Pre-Submission)

The Sites DPD was subject to Regulation 18 consultation in October – November 2019, in accordance with the Community Involvement Plan prepared to accompany the Regulation 18 Sites DPD. This Community Involvement Plan relates to the Regulation 19 consultation.

2. Role and Purpose of the Community Involvement Plan

Mid Sussex District Council adopted its Statement of Community Involvement (SCI) in March 2019.

The SCI contains 6 General Principles for Community Engagement:

- 1) **Be Timely:** Involve the community as early as possible in decision making
- 2) **Be Inclusive:** Accessible to all those who wish to take part
- 3) **Be Transparent:** Consultation material should be clear and plain-English
- 4) **Be Respectful of Other's Views:** The Council will listen to all views
- 5) **Be Efficient:** Consultation to be proportionate and use resources wisely
- 6) **Be Clear About the Results:** Decisions and results should be made clear

The SCI recognises that there is no “one size fits all” approach to consultation; recognising that each decision that requires community involvement may be for different audiences or different purposes. The SCI therefore requires that a bespoke Community Involvement Plan (CIP) is prepared for each consultation on Planning Policy documents (such as the Sites DPD) so that consultation can be tailored.

This Community Involvement Plan follows the template set out in the SCI. It sets out:

- Who is involved in the production and consultation of the Sites DPD;
- Why people are being involved in the process;
- When and how people will be able to get involved and influence the Sites DPD; and
- How the results of community involvement will be used.

The Sites DPD is accompanied by a Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, all of which are also subject to consultation at Regulation 19 stage and therefore the same consultation arrangements set out in this CIP.

3. Who is to be involved?

Early engagement

In the SCI, the Council commits to ‘front load’ consultation activity, to identify potential issues and options. This work has assisted in the formulation of policies and has informed and updated the evidence base. Early engagement with stakeholders has been sought from the very start of the process of producing the Sites DPD, including:

- Oversight of the DPD’s preparation has been led by elected Councillors through the Site Allocations Document Members Working Group.
- Town and Parish Councils have been briefed and consulted in relation to the Strategic Housing and Employment Land Availability Assessment (SHELAA) and methodology for the site selection.
- A Developers Liaison Group, which includes representatives from across the development industry, was also established and consulted in relation to the SHELAA and methodology for site selection.
- Neighbouring Local Authorities and County Authorities; as a result, the District Council has been able to enter into Statements of Common Ground (SoCGs) with neighbouring authorities.
- External organisations, such as the High Weald AONB Unit. It is the Council’s intention to invite relevant public bodies to enter into SoCGs.
- Consulting other statutory consultees, such as Historic England, the Environment Agency and Natural England.

SoCGs prepared for the Sites DPD provide an update on agreements made in relation to the District Plan and focus on the issues arising from the allocation of sites. Further information about early engagement during the preparation of the Sites DPD, and details of SoCGs will be included in a Duty to Cooperate Statement to accompany the DPD and will be made available on the Council’s website.¹

Including everyone

The Equality Impacts Assessment (EqIA) that accompanies the DPD considers the needs of people classified as having ‘protected characteristics’.² This assessment concludes that there are a number of future actions to ensure that everyone has the opportunity to engage with the consultation, and particularly in terms of removing barriers of involvement for protected groups.

In terms of consultation, the Council must continue to promote consultation exercises that are inclusive of all, including engagement with representative organisations and monitoring of the

¹ Available at: <https://www.midsussex.gov.uk/SitesDPD>

² As defined by the *Equality Act 2010*

consultation. This consideration includes things like making documents available on the website, which is equipped with 'BrowseAloud' to make the website more accessible.

There is further analysis of consultation practices and the actions that will be taken to ensure that everyone has the opportunity to engage with the consultation included within the EqIA which accompanies the Sites DPD.³

Who will be contacted?

A number of groups will be directly contacted and asked for their comments. These are:

- District Councillors;
- Town and Parish Councils;
- 'Specific consultation bodies' / 'general consultation bodies' (statutory consultees) as set out in legislation.⁴ These include West Sussex County Council, adjoining local planning authorities, service providers and government agencies such as the Environment Agency and Natural England, and the South Downs National Park Authority;⁵
- Other organisations, groups or individuals that may have an interest in the Sites DPD. These include members of the Mid Sussex Partnership, voluntary services' associations, residents' associations, housing associations, business groups and associations, environmental, countryside and conservation groups, youth and elderly persons' groups and the development industry;
- Representatives of those groups highlighted as requiring targeted consultation by the EqIA;
- Subscribers to the Planning Policy e-mail alerts service⁶; and
- Internal consultees at the District Council.

Elected District Councillors have a key role to play in forming the Sites DPD and will be fully involved in the process through:

- The Site Allocations Document Members Working Group;
- The Scrutiny Committee for Housing, Planning and Economic Growth (any District Councillor can attend and request to speak);
- Full Council (consists of all District Councillors); and
- Councillors will be directly informed and can respond during the public consultation period.

4. Why are people being involved?

We are asking for people's views on the Sites DPD through a formal consultation period. It is important to seek input from the wider public, as the Plan will allocate sites for development in the district and include planning policies that will have an impact upon both the existing and future communities of Mid Sussex.

In order to make the consultation more meaningful, it is important that people understand the context within which the DPD has been drafted and that certain aspects of the Plan may not be able to be changed as a result of consultation:

- At this time comments can only be made on the Submission Draft Site Allocations DPD (Regulation 19), and the accompanying Sustainability Appraisal, Habitats Regulations Assessment, and EqIA.

³ Available at: <https://www.midsussex.gov.uk/SitesDPD>

⁴ *The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*

⁵ Details of these groups are set out in the 'Key Contacts List' available at: www.midsussex.gov.uk/sci.

⁶ To receive news and updates on policy documents being prepared please sign up to our email alerts at: <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/#topic-planning-policy-email-alerts>

- The Sites DPD has been written in line with Government planning policy and guidance, set out in the National Planning Policy Framework (2019) and Planning Practice Guidance.
- The Sites DPD has been written in accordance with legislation and regulations.⁷
- The Sites DPD has been informed by the results of the accompanying Sustainability Appraisal. This shows which options have been considered for its strategy and policies and why the options chosen are preferred over those rejected.
- The Sites DPD has been informed by background evidence. The background evidence (and any updates) will be made available to view on the Council's website.⁸

⁷ *Planning and Compulsory Purchase Act 2004*, and other relevant legislation.

⁸ Available at: <https://www.midsussex.gov.uk/SitesDPD>

5. When will people be involved?

Public Consultation on 'Preferred Options' draft plan (Regulation 18)	Mid Sussex District Council carried out a public consultation for the draft Sites DPD (Reg. 18) from the 9th of October to the 20th of November 2019.
Public Consultation prior to plan submission for examination (Regulation 19)	Following agreement by Council on 22 nd July 2020, the Council will 'publish' the Submission Draft Sites DPD for public consultation for an eight-week period scheduled for 3 rd August - 28 th September 2020 During this time stakeholders can make further representations on the Sites DPD and these will be considered by the Planning Inspector appointed to carry out the examination.

Further details of the timetable are available at: <https://www.midsussex.gov.uk/SitesDPD>

The regulations specify a minimum 6-week consultation period for receiving consultation comments. In order to ensure that as many stakeholders are afforded the opportunity to respond (given the Covid-19 situation, and the commencement of consultation during the summer holidays), the Council has deemed an 8-week consultation period appropriate. This will be kept under review as the consultation progresses, and may need to be flexible to respond to any changing Government guidance, the health situation within the district and any local lockdowns/restrictions that may be enforced.

6. How will people be involved?

The consultation will be open to all and we will seek to inform and receive comment from the widest possible range of people. We will:

- Send out a press release, an email alert and utilise social media;
- Put all the details and documentation on the Council's website including an on-line response form. All on-line material will be compatible with 'BrowseAloud' for people who find it difficult to read on-line;
- Utilise electronic methods wherever possible in addition to traditional methods to make it as easy as possible to advertise and respond to the consultation;
- A translation service is available to those for whom English is a second language;
- Send letters or emails to all the 'specific consultation bodies' (statutory consultees) and to all the other organisations listed in section 2 above;
- Send letters or emails to all those who responded to the Regulation 18 consultation, inviting them to comment during the Regulation 19 consultation.

Availability of Documents

Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the requirements for documents to be made available for inspection.

35.—(1) A document is to be taken to be made available by a local planning authority when—

(a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and

(b) published on the local planning authority's website,

In terms of criterion (a), the Sites DPD consultation documents will be available to view at the Mid Sussex District Council offices during normal office hours. At the time of writing, the Reception is closed to walk-in members of the public due to the Covid-19 outbreak however is open to those with an appointment. In order to comply with government guidance related to Covid, including social distancing, the Sites DPD consultation materials will be available to view to those making an appointment in advance. This can be arranged by contacting the Council's switchboard on 01444 458166 or the Planning Policy Team on PlanningPolicy@midsussex.gov.uk

In terms of "other such places" set out in criterion (a), the Council usually provides hard copy documents of consultation material to Libraries and Help Points. At the time of writing, the district's libraries are preparing to re-open albeit with limited capacity and services. The District Council will send hard copies of the Sites DPD consultation material to each of the libraries and help points and provide instructions for accessing the documentation on the Council website (which could be accessed using library PCs for example). The availability of documents at these locations will be subject to Government guidance and the current health situation – this will be kept under close review during the consultation period and alternative or additional venues/methods will be sought (and locations advertised) if necessary to ensure that stakeholders are able to view the documents in person during the consultation period.

In addition to meeting the legal requirements above, hard copies will also be provided to the Town and Parish Councils within the district – these are not formal deposit points in terms of the regulations (i.e. they are not specified on the Statement of Representations Procedure/Notice of Submission). Document availability at these locations will be at the discretion of the individual Town and Parish Council's and will depend on whether they are open to the public.

The Sites DPD, supporting documentation and evidence base will be available to view on the Council's website at www.midsussex.gov.uk/SitesDPD

Submitting Responses

Comments must be submitted in writing (physical or digital) and cannot be accepted as anonymous. All information received is public information, subject to relevant data protection legislation.⁹

Comments can be submitted via the website, email or by post. A response form will be made available which can be completed and submitted on the MSDC website. All responses can also be returned by:

Post to: Planning Policy, Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS

E-mail to: LDFconsultation@midsussex.gov.uk

⁹Such as the *Data Protection Act (2018)*

7. What happens to the results?

Following consultation, the Council will submit all responses to the Planning Inspector appointed to carry out the examination for consideration. These will be submitted alongside the Sites DPD and supporting documentation.

The Council is required¹⁰ to summarise the main issues raised and publish a consultation statement that sets out:

- Who was invited to make representations to the draft Sites DPD (Regulation 18), how this was done, a summary of the main issues raised and how they were taken into account;¹¹
- Who was invited to make representations to the Submission Draft Sites DPD (Regulation 19), how this was done, how many representations were received, and a summary of the main issues raised.¹²

Notification that the summary report has been published will be sent to all statutory consultees, Planning Policy email alert subscribers and respondents who submitted a response and expressed a wish to be notified of the submission of the Sites DPD to the Secretary of State.

If you have any comments or queries on this Community Involvement Plan, please contact the Planning Policy team on PlanningPolicy@midsussex.gov.uk or 01444 477488.

If you have a comment or concern with your experience of a Council-led community involvement exercise, you should in the first instance contact the team using the details above. Alternatively, you can contact the Customer Services and Communications Team by phone (01444) 477478 or by writing to Customer Services and Communications, Mid Sussex District Council, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS.

¹⁰ *The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Regulation 22.*

¹¹ *The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Regulation 18.*

¹² *The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Regulation 20.*

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RECOMMENDATIONS FROM CABINET – 6 July 2020

1. BUDGET MANAGEMENT 2020/21 – PROGRESS REPORT APRIL TO MAY 2020

Cabinet considered the progress on the Revenue Budget, Capital Programme and Revenue Projects and Treasury Management for 2020/21.

Summary

1. The forecast revenue outturn position for 2020/21 at the end of May is showing a projected net overspend of £2,909,000 against the original budget. This mainly relates to the impact of Covid19 which has resulted in both a downturn in income across the Council as well as additional unbudgeted costs; which together total £4,037,000. However, these have been partly offset by MHCLG Emergency grant funding of £1,499,659 as detailed in paragraph 23. In addition, there are on-going savings / pressures from 2019/20 which will be built into the 2021/22 budget.
2. This level of overspend is unprecedented for Mid Sussex, but is not uncommon for shire districts this year as a direct result of the Covid pandemic adversely affecting all sources of income. Whilst there remains the possibility of central government funding these losses, Members are warned that some significant draw on reserves may be needed to balance the budget by year end, after using the Covid Emergency Funding Grant. However, those sums, whilst significant, should not lead to concerns over the viability of the authority in the short term, but evidently the budget over the medium term will need to be brought into a position where expenditure is not in excess of income from all sources.

Recommendations

3. **That Council approve:**
 - (i) **that £357,996 grant income relating to Homeless Support Grant be transferred to Specific Reserves as detailed in paragraphs 25 of the Cabinet report;**
 - (ii) **that £5,483 grant income relating to Cold Weather Fund Payment Grant be transferred to Specific Reserve as detailed in paragraph 26 of the Cabinet report;**
 - (iii) **that £8,428 grant income relating to Local Authority Data Sharing Programme Grant be transferred to Specific Reserve as detailed in paragraph 27 of the Cabinet report;**
 - (iv) **that £34,629 grant income relating to Implementing Welfare Reform Grant be transferred to Specific Reserve as detailed in paragraph 28 of the Cabinet report;**
 - (v) **that £25,242 grant income relating to New Burdens Verify Earnings & Pensions Grant be transferred to Specific Reserve as detailed in paragraph 29 of the Cabinet report;**

- (vi) that £1,233 grant income relating to New Burdens Transparency code and £1,380 grant income relating to New Burdens Severe Disability Premium changes be transferred to Specific Reserve as detailed in paragraph 30 of the Cabinet report;**
- (vii) that £695,753 grant income relating to COVID 19 Council Tax Hardship Fund be transferred to Specific Reserve as detailed in paragraph 31 of the Cabinet report;**
- (viii) the variations to the Capital Programme contained in paragraph 38 of the Cabinet report in accordance with the Council's Financial Procedure rule B3.**

2. BURGESS HILL LIBRARY DEMOLITION 2020

Cabinet considered the case for demolishing the redundant Burgess Hill library building and a direct contract award with a specialised contractor to deliver the demolition over the summer and early autumn.

Recommendation

That Council approve:

- (i) that this project is added to the Capital Programme 2020/21, financed from the General Reserve, and that the Head of Corporate Resources is delegated to contract with those bodies necessary to achieve the project outcomes.**
- (ii) and that a further report is to follow to Cabinet detailing the project costs.**