

# Mid Sussex District Plan (Regulation 19) Sustainability Appraisal

## Environmental Report

Final

November 2023

Prepared for:

Mid Sussex District Council

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# Contract

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This report describes work commissioned by Mid Sussex District Council by an instruction dated 3rd October 2023. JBA Consulting carried out this work.

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## Abbreviations

|       |  |
|-------|--|
| ALC   | Agricultural Land Classification       |
| AONB  | Area of Outstanding Natural Beauty     |
| AQMA  | Air Quality Management Area            |
| BMV   | Best and Most Versatile                |
| BUAB  | Built-Up Area Boundary                 |
| DMRB  | Design Manual for Roads and Bridges    |
| DPD   | Development Planning Document          |
| DPR   | District Plan Review                   |
| DfT   | Department for Transport               |
| EA    | Environment Agency                     |
| EC    | European Community                     |
| IRZ   | Impact Risk Zone                       |
| GIS   | Geographical Information System        |
| HRA   | Habitats Regulations Assessment        |
| LFRMS | Local Flood Risk Management Strategy   |
| LNR   | Local Nature Reserve                   |
| LSE   | Likely Significant Effects             |
| LVIA  | Landscape and Visual Impact Assessment |
| LWS   | Local Wildlife Site                    |
| MFGS  | Multi-Functional Green Space           |
| MSA   | Mineral Safeguarding Area              |
| MSDC  | Mid Sussex District Council            |
| MSDPR | Mid Sussex District Plan Review        |
| NBS   | Nature Based Solutions                 |
| NERC  | Natural Environment Research Council   |
| NHS   | National Health Service                |
| NNR   | National Nature Reserve                |
| NPPF  | National Planning Policy Framework     |
| ODPM  | Office of the Deputy Prime Minister    |
| PRoW  | Public Right of Way                    |

|        |   |
|--------|---|
| RPG    | Regional Planning Guidance                          |
| SA     | Sustainability Appraisal                            |
| SAC    | Special Area of Conservation                        |
| SEA    | Strategic Environmental Assessment                  |
| SHELAA | Strategic Housing & Economic Land Avail. Assessment |
| SHMA   | Strategic Housing Market Assessment                 |
| SI     | Site Investigation                                  |
| SM     | Scheduled Monument                                  |
| SPA    | Special Protection Area                             |
| SSSI   | Site of Special Scientific Interest                 |
| TAG    | Transport Analysis Guidance                         |
| TPO    | Tree Preservation Order                             |
| ZoI    | Zone of Influence                                   |

## Definitions

| Term                               | Definition   |
|------------------------------------|--|
| Area of Outstanding Natural Beauty | Areas of Outstanding Natural Beauty were formally designated under the National Parks and Access to the Countryside Act of 1949. They protect areas of the countryside of high scenic quality that cannot be selected for National Park status because of their lack of opportunities for outdoor recreation. Natural England (formerly The Countryside Agency) is responsible for designating AONBs and advising the Government and others on how they should be protected and managed. |
| Agricultural Land Classifications  | The Agricultural Land Classification is part of the planning system in England and Wales – it provides a method for classifying agricultural land in six categories, or “grades” according to versatility and suitability for growing crops.   |
| Biodiversity Action Plan           | Plans developed by organisations to protect and enhance the biodiversity of an area.   |
| Carbon Dioxide Equivalent          | CO <sub>2</sub> e is a metric measure used to compare the emissions from various greenhouse gases based on their global-warming potential.   |
| Environment Agency                 | Non-departmental public body responsible for protecting and improving the environment.   |

| Term   | Definition  |
|--|---|
| Flood and Coastal Erosion Risk Management Strategy | The strategy describes what needs to be done by all risk management authorities involved in flood and coastal erosion risk management for the benefit of people and places.   |
| Habitat Regulations Assessment                     | A process that determines whether the proposed strategy could significantly impact the designated features of protected European sites.   |
| Indices of Multiple Deprivation                    | The Index of Multiple Deprivation measures relative deprivation in an area. It is a combined measure of deprivation based on 37 separate indices of deprivation, grouped into seven key domains reflecting different aspects of deprivation.                                  |
| Landscape Character Assessment                     | The process of identifying and describing variation in character of landscape in a certain area. The assessment identifies and explains the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. |
| Local Biodiversity Action Plan                     | Local plans developed by Local Planning Authorities to protect and enhance the biodiversity of an area.   |
| Local Geological Site                              | Geological sites that are important for historical, scientific research or educational reasons.   |
| Lead Local Flood Authority                         | County councils and Unitary Authorities which lead in managing local flood risk.  |
| Local Nature Reserve                               | Statutory designation under the National Parks and Access to Countryside Act 1949. These can be declared by Parish and Town Council, but these must be delegated to by principle local authority.   |
| Lower Super Output Area                            | Lower Layer Super Output Area are areas of population household minimum and maximum thresholds. These areas were designed to improve the reporting of small area statistics.  |
| Nature-Based Solution                              | The sustainable management of the environment using natural features and processes. In the context of the LFRMS, NBS can be used to reduce the risk of flooding through schemes such as afforestation, wetland restoration and green infrastructure.                          |
| National Character Area                            | A natural subdivision of England based on a unique sense of place. The Character Area framework is used to describe and shape objectives for the countryside, its planning and management.  |
| National Planning Policy Framework                 | The National Planning Policy Framework constitutes all policy statements and guidance documents into one document which forms a core part of the national planning system.  |



| Term                                | Definition  |
|-------------------------------------|---|
| National Nature Reserve             | Reserves established to protect some of our most important habitats, species, and geology, and to provide outdoor laboratories for research.  |
| National Recovery Network           | The Nature Recovery Network is a commitment of the government's 25 Year Environment Plan. It is a national network of wild-life rich places which aims to help deal with biodiversity loss, climate change and wellbeing.   |
| Office of National Statistics       | The Office for National Statistics is the executive office of the UK Statistics Authority, a non-ministerial department which reports directly to the UK Parliament.  |
| Planning Policy Guidance            | Planning Policy Guidance Notes are statements of the Government's national policy and principles towards certain aspects of the town planning framework.  |
| Public Right of Way                 | A public right of way is a right by which the public can always pass along routes over land.  |
| Special Area of Conservation        | Special Areas of Conservation are protected in the UK under, the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales. The purpose of this designation is to conserve the habitat and species identified in the EU Habitats Directive. |
| Strategic Environmental Assessment  | A decision support process which aims to promote sustainable development by assessing the extent to which the emerging plan will help achieve relevant environmental, economic, and social objectives.  |
| Special Protection Area             | Protected areas for birds in the UK, under the Wildlife & Countryside Act 1981 and the Conservation Regulations 2010.   |
| Site of Special Scientific Interest | A conservation designation legally protected under the Wildlife and Countryside Act 1981 (as amended). These sites are selected for wildlife and natural features in England.   |
| Sustainable Drainage System         | SuDS are designed to manage stormwater, mimicking natural drainage and manage pollution risks resulting from runoff.  |
| Water Framework Directive           | The Water Framework Directive is a European Union directive transposed into UK law through The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. It aims to prevent deterioration of the water environment and improve water quality.   |

# Non-Technical Summary

## Introduction

Mid Sussex District Council (MSDC) is currently preparing a District Plan Review (DPR) for Mid Sussex. The DPR will set out a long-term vision, planning policies, and site allocations for the authority area up to 2039.

Plans such as Mid Sussex's DPR are subject to a process called Sustainability Appraisal (SA). The Sustainability Appraisal assesses the potential social, environmental, and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

This Sustainability Appraisal Report has been prepared by JBA Consulting to document the SA (incorporating a Strategic Environmental Assessment (SEA)) of the Publication Draft of the Mid Sussex DPR being prepared for Regulation 19 consultation.

## Purpose of this assessment

Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (2004 SI 1633), known as the 'SEA Regulations'. These Regulations were originally transposed from the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), prior to the UK's departure from the EU. Therefore, it is a legal requirement for the Mid Sussex Publication Draft (Regulation 19) DPR to be subject to SA and SEA throughout its preparation.

The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 have modified several inspection requirements set out in the SEA Regulations that require responsible authorities to make physical copies of documents available for inspection at their principal office. This is particularly relevant to this stage of the Mid Sussex DPR.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process, whereby the requirements of the SEA Regulations can also be met through a single integrated SA process – this is the process that is being undertaken for the Mid Sussex DPR (Regulation 19). Therefore, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

## Background to the Mid Sussex District Plan Review

Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014 - 2031 in March 2018. The Mid Sussex District Plan set out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) to allocate housing and employment sites to address the needs identified in the District Plan, to allocate a site for a Science and Technology Park, west of Burgess Hill and to set out additional strategic

policies relating to the delivery of sustainable development. The Site Allocations DPD was adopted by the Council in June 2022.

Following the Examination in Public of the District Plan and the acknowledgement of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review of the District Plan commencing in 2021 with submission to the Secretary of State in 2023.

The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park (the South Downs National Park Authority are responsible for strategic planning within this area). The DPR will determine the overall strategy for future development across the district for those areas outside the South Downs National Park (i.e., the Plan area) to 2039 including the location of residential development to address the identified housing need.

In 2022, the Council published its Consultation Draft (Regulation 18) stage of the DPR. This set out its spatial vision and objectives, which together provided the framework for the DPR policies, and its spatial strategy, which examined the key development issues of relevance to Mid Sussex and identified a series of options for each policy area to deal with these issues. Alongside this, Lepus Consulting was appointed to undertake a SA and published its appraisal of options (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework.

### Summary of the Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For the Mid Sussex Publication Draft (Regulation 19), this involves assessing the spatial strategies, policies and site allocations, as well as any reasonable alternative considered by Mid Sussex District Council, to identify the extent to which sustainable development is likely to be achieved.

The SA has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2014), and Royal Town Planning Institute (RTPI, 2018).

This SA report assesses the sustainability performance of the updated options, policies and reasonable alternative sites considered during this DPR. This SA accompanies the Publication Draft (Regulation 19) Mid Sussex District Plan Review 2021 to 2039.

### Developing the SA Framework

The SA Framework is used to identify and evaluate the potential sustainability effects associated with the implementation of the DPR. The SA Framework, outlined by Lepus Consulting at the Regulation 18 stage and carried forward to this Regulation 19 stage, is comprised of SA Objectives, decision-making criteria, and monitoring indicators. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the

topics identified in Schedule 2 of the SEA Regulations. The 14 SA Objectives used in the assessment are listed in Table 1 below.

**Table 1: Sustainability Appraisal Objectives**

| SA Objective |  |
|--------------|--|
| 1            | <b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.  |
| 2            | <b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.  |
| 3            | <b>Education:</b> 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            | <b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.   |
| 5            | <b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources.   |
| 6            | <b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.  |
| 7            | <b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity.  |
| 8            | <b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.  |
| 9            | <b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.  |
| 10           | <b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. |
| 11           | <b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.   |
| 12           | <b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  |

| SA Objective |   |
|--------------|---|
| 13           | <b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.                                       |
| 14           | <b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities. |

Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust, and thorough. The SA Objectives are at a strategic level and can potentially be open-ended. To focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of reasonable alternatives. Table 2 summarises the purpose and requirements of the SA objectives, appraisal criteria, and indicators.

**Table 2: Definition of Sustainability Appraisal objectives, appraisal criteria, and monitoring indicators**

| Item                        | Purpose   |
|-----------------------------|---|
| <b>Objective</b>            | Provide a benchmark 'intention' against which the sustainability effects of the plan can be tested. They need to be fit-for-purpose and represent the key sustainability issues of relevance to the District Plan area. |
| <b>Appraisal question</b>   | Aid the assessment of impact significance. Provide a means of ensuring that key environmental and sustainability issues are considered by the assessment process.   |
| <b>Monitoring indicator</b> | Provides a means of measuring the progress towards achieving the sustainability objectives over time. Needs to be measurable and relevant and ideally relies on existing monitoring networks.                           |

### Changes following the Consultation Draft (Regulation 18)

The planning policy team at MSDC has been receptive to changes and iterations in spatial strategies, policies and sites, and the appraisal throughout various stages of the SA process.

Following receipt of consultee comments on the Consultation Draft (Regulation 18) District Plan, there have been minor and major policy changes along with the introduction of new policies and inclusion of additional reasonable alternative sites.

## Summary of SA findings (Regulation 19)

The Regulation 19 SA has drawn upon the SA undertaken by Lepus Consulting at Regulation 18 to provide an updated assessment of the preferred spatial option, policies and site allocations. This assessment has sought to determine the impact of these preferred options on a series of environmental and socio-economic considerations, and determine the extent to which sustainable development would likely be achieved.

## Proposed monitoring

This SA provides some suggested monitoring indicators for each SA objective. It is acknowledged that these may not all be collected due to resource limitation and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the SA Framework, but that monitoring should focus on significant sustainability effects.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

## Concluding statement

This SA has been conducted in line with the SEA Regulations. The appraisal shows that the Regulation 19 Draft DPR will have a largely positive effect, to varying degrees, against many of the SA objectives, with some neutral and negative. The draft DPR seeks to balance the social, economic and environmental expected impacts to meet the vision for the district.

The Regulation 19 Draft DPR and this SA Environmental Report will be subject to consultation. Following the consultee period, the DPR will be finalised and published alongside the SA Environmental Report.

# 1 Introduction

## 1.1 Background

Mid Sussex District Council (MSDC) is currently preparing a District Plan Review (DPR) for Mid Sussex. The DPR will set out the development strategy, planning policies, and site allocations for the authority area up to 2039.

Plans such as Mid Sussex's DPR are subject to a process called Sustainability Appraisal (SA). The Sustainability Appraisal assesses the potential social, environmental, and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

This Sustainability Appraisal Report has been prepared by JBA Consulting to document the SA (incorporating a Strategic Environmental Assessment (SEA)) of the Publication Draft of the Mid Sussex DPR being prepared for Regulation 19 consultation.

## 1.2 The Plan area

Mid Sussex is a rural district in the South East of England. The district has three towns, Burgess Hill, East Grinstead, and Haywards Heath, as shown in Figure 1-1 below. The 2021 census recorded the number of residents as 152,6004. Approximately 62% of the Mid Sussex population live in the three towns, with the remaining 38% living in the villages. The district has a higher-than-average number of retired residents (aged over 65).

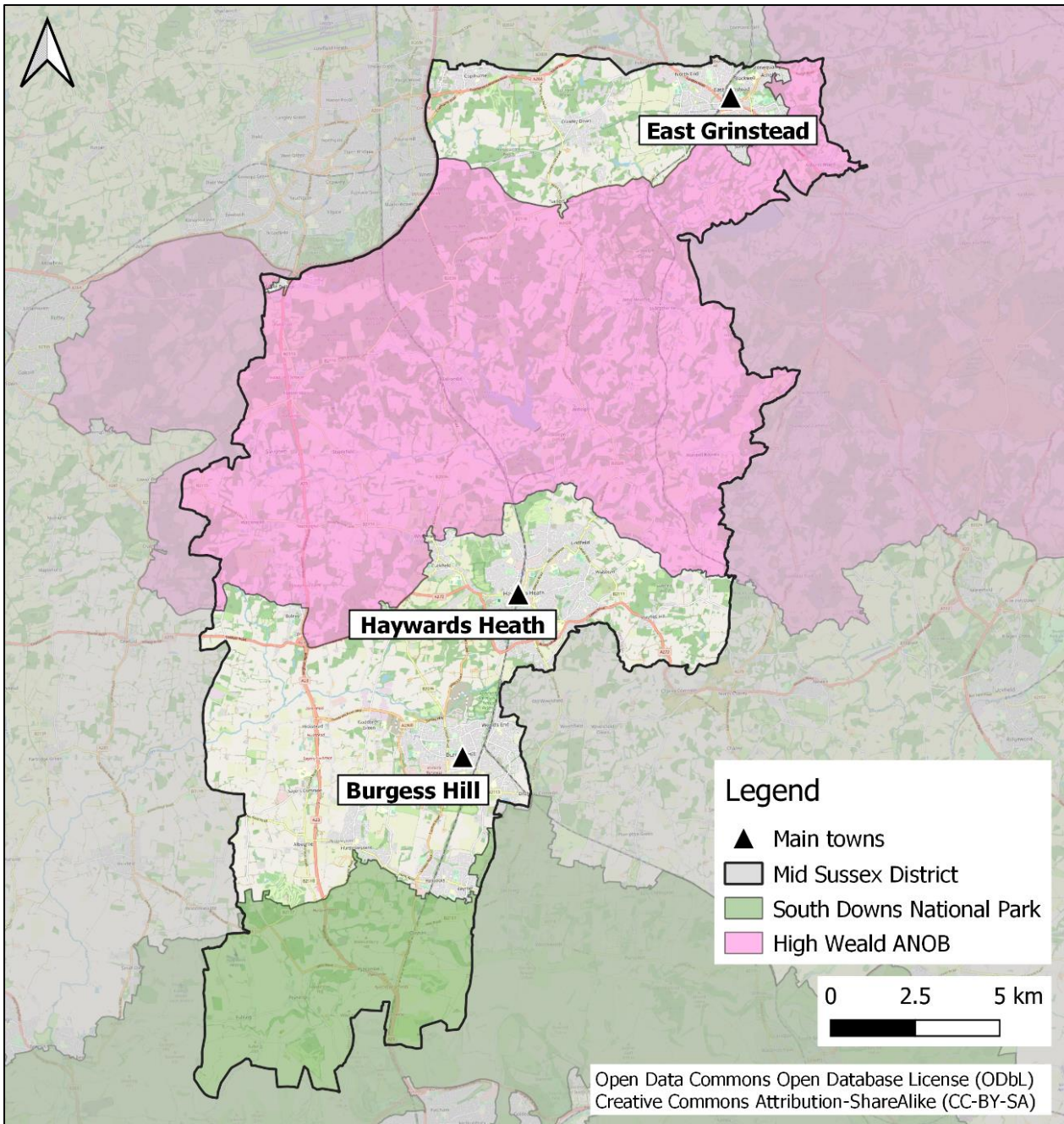


Figure 1-1: Mid Sussex District Plan Area

Nearly 50% of the district is within the High Weald Area of Outstanding Natural Beauty (AONB) and over 10% is within the South Downs National Park. As of 22/11/23, Areas of Outstanding Natural Beauty have been renamed as “National Landscapes”. However, at the time of writing and assessment, the name AONB was still used and has therefore been used throughout this document.

Between the AONB and National Park lies an area of landscape known as the Low Weald. Mid Sussex is the tenth most wooded district in the South East and two-thirds of this woodland is classified as ‘ancient woodland’. It also has many sites valued for their biodiversity. Ashdown Forest, lying in neighbouring Wealden District Council area, is a



Habitats site designated as both a Special Protection Area (SPA) and Special Area of Conservation (SAC).

Mid Sussex District has a very low level of unemployment. It has a relatively skilled and educated workforce and has access to further educational establishments within the district and two universities in Brighton. The district is well connected with good links by road and rail to London, Brighton and Gatwick and is within easy travelling distance of the Channel Tunnel, Southampton, and Dover.

Several innovative and nationally known businesses are located in the district. A third of businesses are within the professional, scientific and technical, and information and communication sectors. There is a range of smaller businesses across sectors such as finance, service industries and light manufacturing. The nature of the local economy is strongly influenced by the wider regional context in which it sits. Mid Sussex is located in proximity to Crawley and London Gatwick Airport and within commuting distance of London and Brighton and the south coast. The Council is a partner in the Gatwick Diamond Initiative (an economic area centred upon the airport but covering nine local authority areas) and the larger 'Coast to Capital' Local Enterprise Partnership which stretches from Chichester in the west to Brighton in the south through to Croydon in the north.

### **1.3 Mid Sussex Development DPR 2021 - 2039**

MSDC adopted the Mid Sussex District Plan 2014 - 2031 in March 2018 ('the adopted plan'). In this document the Council committed to reviewing the District Plan, starting in 2021, in accordance with the 5-year review requirement set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The National Planning Policy Framework (NPPF, September 2023) mirrors the legislation by requiring Local Planning Authorities to review Local Plans at least once every five years and update them as necessary.

The Mid Sussex District Plan sets out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) to allocate housing and employment sites to address the needs identified in the District Plan, to allocate a site for a Science and Technology Park, west of Burgess Hill and to set out additional strategic policies relating to the delivery of sustainable development. The Site Allocations DPD was adopted by the Council in June 2022.

Following the Examination in Public of the District Plan and the acknowledgement of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review of the District Plan commencing in 2021 with submission to the Secretary of State in 2023. National Planning Policy requires plans to look ahead for a minimum of 15 years from adoption (anticipated 2024). The plan period therefore extends to 2039, eight years beyond the existing District Plan.

This SA report assesses the sustainability performance of the updated options considered during this Development Plan Review. This SA accompanies the Publication Draft (Regulation 19) Mid Sussex District Plan Review 2021 to 2039.

The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for those areas of the district lying within its boundaries. The DPR will determine the overall strategy for future development across the district for those areas outside the South Downs National Park (i.e., the Plan area) to 2039 including the location of residential development to address the identified housing need.

In 2022, the Council published its Consultation Draft (Regulation 18) stage of the DPR. This set out its spatial vision and objectives, which together provided the framework for the DPR policies, and its spatial strategy, which examined the key development issues of relevance to Mid Sussex and identified a series of options for each policy area to deal with these issues. Alongside this, Lepus Consulting was appointed to undertake a Regulation 18 SA and published its appraisal of options (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework.

Based on the evidence gathered and consultation undertaken previously, the Preferred Options Plan has been developed (the 'Regulation 19' plan) which sets out MSDC's proposed approach to delivering the development needs of the district and the draft policies to guide the nature of the development and protect valuable community, historic and natural assets.

### 1.3.1 Level of housing need in Mid Sussex

A series of evidence based studies, including a Strategic Housing Market Assessment (SHMA), have been undertaken to determine the district's housing need.

The total housing requirement for Mid Sussex District is 1,090 dwellings per annum, which equates to a total of 19,620 dwellings between 2021 and 2039. As of 1st April 2023, there were 9,921 commitments made up from planning permissions and development plan allocations that have yet to be implemented, and 2,240 completions. Therefore to ensure that housing need is met, the District Plan needs to make a minimum provision of 7,459 dwellings.

### 1.3.2 Neighbouring authority housing need

The West Sussex & Greater Brighton (WS&GB) Strategic Planning Board, made up initially of the coastal West Sussex local planning authorities together with Brighton & Hove City Council and Lewes District Council, now expanded to include authorities within the Northern West Sussex HMA (Mid Sussex, Crawley and Horsham) works to support better integration and alignment of strategic spatial and investment policies in WS&GB.

Mid Sussex plays an active role in LSS3: the development of a longer-term strategy to address spatial options for meeting strategic housing, employment and infrastructure needs over the period to 2050. Duty to co-operate meetings have been held with all neighbouring authorities, with a particular focus on the predominant Northern West Sussex HMA. Regular and ongoing meetings have been held with Crawley and Horsham to discuss unmet needs with Northern West Sussex Housing Market Area to seek solutions. Crawley has an existing unmet need of 7,050 dwellings, with Horsham also likely to have unmet need.

#### **1.4 Sustainability Appraisal and Strategic Environmental Assessment**

Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (2004 SI 1633), known as the 'SEA Regulations'. These Regulations were originally transposed from the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), prior to the UK's departure from the EU. Therefore, it is a legal requirement for the Mid Sussex Publication Draft (Regulation 19) DPR to be subject to SA and SEA throughout its preparation.

The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 have modified several inspection requirements set out in the SEA Regulations that require responsible authorities to make physical copies of documents available for inspection at their principal office. This is particularly relevant to this stage of the Mid Sussex DPR. Further details are described in Chapter 2.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance), whereby the requirements of the SEA Regulations can also be met through a single integrated SA process – this is the process that is being undertaken for the Mid Sussex DPR (Regulation 19). Therefore, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

#### **1.5 Habitats Regulations Assessment**

Under the Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of European sites and to ascertain whether it would adversely affect the integrity of those sites. European sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and under UK Government policy, Ramsar sites.

Ashdown Forest, lying in neighbouring Wealden District Council area, is a Habitats site designated as both a SPA and SAC. Its proximity to Mid Sussex means that a Habitats Regulations Assessment (HRA) of the DPR is required. An HRA was prepared alongside the development of the DPR to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The Regulation 18 HRA (AECOM, 2022) explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA/SAC and Castle Hill SAC and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and recreational pressure. The findings indicate that through implementing appropriate mitigation (in liaison with Natural England) it will be possible to conclude that the DPR will not cause any adverse impacts on site integrity.

The HRA for the Publication Draft (Regulation 19) has been undertaken by AECOM on behalf of the Council. While the HRA is being reported separately to the SA, the findings have been considered in the SA, where relevant.

## 1.6 Structure of this Report

This SA is structured into the following sections:

- Chapter 2 presents the context for the SA and how sustainability objectives set by other policies, plans, and programmes, baseline information, and the key environmental, social, and economic issues facing Mid Sussex have been taken into account when preparing this SA.
- Chapter 3 summarises the methodology used to carry out the SA, including the 'SA Framework' (sustainability objectives and supporting assessment criteria) and site assessment criteria used to assess the DPR policies and site allocations, as well as any difficulties encountered in applying the methodology.
- Chapters 4 to 7 describe the results of the SA of each separate component of the DPR - the spatial options (Chapter 4), and site allocations and reasonable alternative allocations (Chapter 5), policies (Chapter 6), and site allocations taking into consideration mitigation measures (Chapter 7).
- Chapter 8 describes the sustainability effects of the DPR as a whole and cumulatively.
- Chapter 9 suggests a set of indicators that can be used to monitor the significant sustainability effects of implementing the DPR and sets out the next steps in the DPR and SA processes.

## 2 Sustainability context

### 2.1 Baseline characteristics of Mid Sussex

A detailed review of the baseline characteristics in Mid Sussex was undertaken during the preparation of the SA Scoping Report (MSDC, 2021). The Scoping Report describes the baseline context and identifies the key sustainability issues in the plan area which informs the preparation of the SA Framework. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.

Where information was available, significant sustainability issues were highlighted. These key sustainability issues were then used to set the overarching SA framework – the SA objectives and supporting assessment criteria against which the DPR objectives and policies have been assessed. The purpose of this was to ensure that the key sustainability issues were fully reflected in the assessment of the sustainability of the DPR, with the Plan’s proposal assessed to determine whether they would positively or negatively affect these issues at a strategic level.

The SA Scoping Report, including the baseline characteristics, key sustainability issues and SA framework was produced by MSDC in November 2021 and was subject to stakeholder consultation. The Scoping Report states that the review of the District Plan policies will likely result in the following status of each policy:

- Policies that remain 'in-date' and will not require amendment;
- Policies that require minor update rather than a full review;
- Policies that require a full review; and
- New policies to supplement existing policies.

This assessment scope was further tested through the Consultation Draft (Regulation 18) process, which included SA of the proposed DPR spatial options for the distribution of development and the reasonable alternative site assessments, as well as a summary of the sustainability performance of the draft DPR policies. The Consultation Draft (Regulation 18) document provides a further detailed review of the baseline characteristics in Mid Sussex and identifies areas for potential growth. The Consultation Draft (Regulation 18) SA was then subject to public and stakeholder consultation between November and December 2022. Comments received related to spatial option assessment conclusions, some site assessment conclusions, and consideration of alternative policies. Consequently, additional assessment has been included within this Regulation 19 SA to address these comments received.

The Consultation Draft (Regulation 19) document has considered the available evidence, provided in the Evidence Base on the Council’s website, and national planning policy to ensure that the DPR has been prepared in accordance with the legal and procedural requirements and is ‘sound’. This document will then be subject to further consultation before submission to the Secretary of State for independent examination.

## 2.2 Policies, plans and programmes

The Mid Sussex DPR is greatly influenced by the requirements, aims and objectives of legislation and regulation, other policies, plans and programmes, and by broader sustainability objectives.

A review of relevant documents was undertaken as part of the SA scoping process and was further reviewed through the SA of the Consultation Draft (Regulation 18) document. The reviews sought to identify how wider strategic objectives could influence the development of the District Plan and the SA process. The full review of other policies, plans, and programmes can be found in Appendix 2 of the SA Scoping Report (MSDC, 2021). Plan and policies considered to be of particular relevant to the DPR are outlined below:

- **The National Planning Policy Framework (NPPF)** was revised in July 2018 and subsequently updated in 2019, 2021 and 2023. This document sets out the government's planning policies for England and how these are expected to be applied. The NPPF is supported by planning practice guidance documents which have also been updated. The original implications outlined in the SA Scoping Report still stand. The additional requirement to seek opportunities for wider environmental net gain, in particular for biodiversity net gains, must be included in the District Plan.
- The **Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020** makes permanent the temporary changes introduced in July 2020. From 31st December, measures to remove the requirement to have documents relating to a Strategic Environmental Assessment available for an inspection at an address, and for copies to be available to be obtained from that address come into force. The existing inspection requirements have been replaced with a duty to make documents available on a public website where they can be downloaded, for the responsible authority to provide copies of documents by email where requested (or physical copies by mail where it is reasonable to do so in light of Covid-19 restrictions), and to provide a telephone number where enquiries about these documents can be made.
- The **National Infrastructure Strategy** was published in November 2020 and sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050.
- The **Planning for the Future White Paper** was published in August 2020, which proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. Consultation ran from August to October 2020.
- The **Environment Act 2021** brought into UK law environmental protections and recovery. Once enacted, biodiversity net gain will be mandated through the planning system and so, the District Plan must ensure targets and mechanisms are included.

Several regulations have also been updated to reflect the UK exit from the European Union (EU) which are also of relevance to the DPR:

- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – no policy changes, changes only to ensure habitat and species protection and standards are implemented in the same or equivalent way following the exit from the EU.
- The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 – no substantive changes are made to the way Environmental Impact Assessments or Strategic Environmental Assessment regimes operate, changes remove unnecessary references, for example to the UK being a Member State.

### **2.3 Key sustainability challenges in Mid Sussex**

Analysis of the baseline information has enabled several key sustainability challenges to be identified. A summary of these challenges as outlined during the Regulation 18 stage is provided in Table 2-1.

Table 2-1: Summary of the key challenges in Mid Sussex to achieve sustainable development.

| Objective as set out in the NPPF   | Key challenges for achieving sustainable development   |
|--|--|
| <p><b>Environmental:</b> to protect and enhance our natural, built and historic environment.</p> | <ul style="list-style-type: none"> <li>• Potential for development to have an impact on Air Quality within the district (Air Quality Management Area) and outside (Ashdown Forest SAC).</li> <li>• The need to conserve and enhance the numerous sites protected for their biodiversity value across the district. The fragmentation and erosion of habitats and the wider ecological network which is a threat to biodiversity.</li> <li>• There is a high pressure to deliver growth in the district and biodiversity net gain will need to be sought.</li> <li>• Large areas of the district are protected for species and habitat value which come under pressure from development and activity.</li> <li>• The impact of climate change on increasing the risk of flooding.</li> <li>• The impact of carbon emissions from numerous sources.</li> <li>• The importance of protected landscapes such as the High Weald AONB within the plan area, and South Downs National Park on the southern boundary, and the impact of development upon them.</li> <li>• The impact of development and other growth on waste generated, including wastewater.</li> <li>• Managing water resources and water quality is key to serve existing and future residents.</li> </ul> |



| Objective as set out in the NPPF   | Key challenges for achieving sustainable development  |
|--|---|
| <p><b>Economic:</b> to build a strong, responsive and competitive economy.</p> | <ul style="list-style-type: none"> <li>• There is a high level of out commuting for work in Mid Sussex which puts pressure on the transport network.</li> <li>• There is a variety of employment need across the district which can be challenging to accommodate locally.</li> <li>• There is a significant difference in average wages between those working in the district and those working outside (potentially leading to out-commuting).</li> <li>• There has been a change in shopping consumer patterns which has been exacerbated by the covid-19 pandemic.</li> <li>• Whilst there is good public transport coverage generally, outside urban areas this can be infrequent, and many residents are reliant on the private car.</li> <li>• Impacts of future development on the highways network, which is already constrained and in need of further investment to increase capacity.</li> </ul>  |
| <p><b>Social:</b> to support strong, vibrant and health communities.</p>       | <ul style="list-style-type: none"> <li>• Mid Sussex has an increasing, ageing and changing population.</li> <li>• Mid Sussex has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries, hospitals and social care.</li> <li>• The delivery of new homes to address housing need in Mid Sussex will result in pressure on the capacity of local services and facilities including health facilities.</li> <li>• Whilst residents in Mid Sussex are generally in good health, it is key for the Council to continue to ensure that future development make a positive contribution to residents' health and well-being.</li> <li>• Ease of access to health facilities is unequal across the district, with limited provision within the rural areas of the district.</li> <li>• The delivery of new homes to address housing need in Mid Sussex will result in pressure on the education facilities capacity.</li> <li>• Ease of access to education facilities is inequal across the district, with reduced provision within the rural areas of the district.</li> </ul> |

| Objective as set out in the NPPF | Key challenges for achieving sustainable development  |
|----------------------------------|---|
|                                  | <ul style="list-style-type: none"> <li>• Although crime levels are low within the district, opportunities for crime need to be further reduced.</li> <li>• The attractiveness of the area directly impacts on house prices which are high in Mid Sussex, leading to affordability issues.</li> <li>• The housing stock in Mid Sussex is largely dominated by larger detached or semi-detached properties which are owner occupied.</li> <li>• Mid Sussex has an ageing population which requires a mixture of housing that will meet the needs for older people, whilst also freeing up houses for younger residents.</li> <li>• An increasing number of households.</li> <li>• Although affordable homes are consistently being delivered in the District, the need for affordable homes is not met by existing or planned supply.</li> <li>• There is a need for affordable housing in Mid Sussex where house prices are high compared to incomes.</li> </ul> |

### 2.3.1 Likely evolution of the key sustainability issues without the DPR

A wide range of key sustainability issues / key challenges have been identified. Many of these issues are relevant not only to Mid Sussex, but also to the wider region and at a national level. These issues are influenced by a wide range of factors and their future evolution is difficult to predict.

The pressures causing these issues are likely to continue regardless of the reviewed District Plan. However, the DPR does have a key role in delivering more sustainable outcomes and meeting sustainability challenges, and provides an important opportunity to deliver new development that can help address local issues in the area. Nonetheless, it also needs to be recognised that the DPR may not impact on some of these issues directly and that any potential effects will be because of changes that occur as a result of DPR policies influencing wider development-related aspects. For instance, the DPR is not likely to directly affect levels of crime or many of the key health issues affecting local residents. However, by providing opportunities for development that generates new job opportunities, affordable housing and community facilities that benefit deprived communities, some of the causes of crime and poor health can begin to be addressed.

The adopted District Plan set the vision and strategy, with accompanying site allocations and policies to achieve the vision and strategy for the plan period 2014 to 2031. The Adopted District Plan will continue to be valid until at least 2031. However, without the DPR, the policies relating to housing supply (including the five year housing land supply) included within the adopted District Plan would be automatically out of date upon its 5th anniversary (2023). The DPR provides an updated vision, strategy, site allocations and policies up to 2039, as opposed to the current plan period to 2031. It provides the opportunity to define new policies that can deliver the vision and address sustainability issues more effectively. Furthermore, the DPR ensures that the policies of the adopted Plan for the local area are relevant and effectively address the needs of the local community, providing an opportunity to address issues which have arisen, the impact of other newly adopted plans, and significant economic changes during the current plan period.

For example, the DPR embeds the UN's 17 inter-connected Sustainable Development Goals and sets out policies within the plan which contribute to one or more of them, which aim to achieve a better and more sustainable future for all. To achieve sustainable development, the DPR has adopted the concept of 20-minute neighbourhoods which provide a framework for new developments that can deliver attractive and inclusive places with services and community facilities that are accessible without the need for a car.

Therefore, the key sustainability issues / key challenges identified would remain in the future and are influenced by legislation and policy at a local, regional, and national level, much of which extends outside the scope of planning policy. Policy provisions relating to housing supply contained in the current District Plan would automatically become out of date in 2023. The DPR provides an important opportunity to deliver specific policies that build upon the existing District Plan and better address many of these issues in a positive

way, either directly or indirectly, through the provision of an up-to-date plan that reflects the latest requirements of the NPPF and delivers effective sustainable development through the 20-minute neighbourhood concept.

### 2.3.2 Changes made to the DPR in response to the Sustainability Appraisal

The planning policy team at MSDC has been receptive to changes and iterations in spatial strategies, policies and sites, and the appraisal throughout the various stages of the SA process. The scope of changes has included revisions to the spatial strategy, policies and site allocations, along with monitoring indicators.

There are likely to be changes that result from the Regulation 19 consultation process and the examination where they relate directly to legal and soundness issues. A further iteration of the Sustainability Appraisal will be prepared at later stages of the District Plan process if required.

# 3 Sustainability Appraisal methodology

## 3.1 The Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For the Mid Sussex DPR Publication Draft (Regulation 19), this involves assessing the spatial strategies, policies and site allocations, as well as any reasonable alternative spatial strategies, policies and site allocations considered by Mid Sussex District Council, to identify the extent to which sustainable development is likely to be achieved.

The SA has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2014), and Royal Town Planning Institute (RTPI, 2018).

### 3.1.1 Meeting legal requirements

Sustainability Appraisal is a compulsory requirement for Local Plans under Section 19 of the Planning and Compulsory Purchase Act 2004. This has since been amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 to ensure it functions effectively following the UK’s exit from the EU. Government guidance requires that SA incorporate the requirements of the SEA Regulations; in practice, SA and SEA follow similar methodologies and it is possible to combine them without losing the essence of either.

Annex I of the SEA Directive sets out the scope of information to be provided through the SA process and can still be used to set the framework for assessment despite the UK’s exit from the EU. This is shown in Table 3-1 below, which also identifies where in the SA process each requirement will be met.

Table 3-1: Stages in the SA/SEA process as identified within Annex I of the SEA Directive.

| SEA Directive requirements   | Where in the SA                |
|--|--------------------------------|
| (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;                | SA Scoping Report (MSDC, 2021) |
| (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; | SA Scoping Report (Chapter 4)  |
| (c) the environmental characteristics of areas likely to be significantly affected;  | SA Scoping Report (Chapter 4)  |

| SEA Directive requirements   | Where in the SA   |
|--|---|
| (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;  | SA Scoping Report (Chapter 4)                             |
| (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;                                   | SA Scoping Report (Chapter 5)                             |
| (f) likely significant effects on the environment – issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these factors; | SA Environmental Report (Chapters 4-8 and Appendices A-D) |
| (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;   | SA Environmental Report (Chapters 4-8 and Appendices A-D) |
| (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;   | SA Environmental Report (Chapters 4-8 and Appendices A-D) |
| (i) a description of the measures envisaged concerning monitoring in accordance with Article 10; and   | SA Environmental Report (Chapter 9)                       |
| (j) a non-technical summary of the information provided under the above headings.  | SA Environmental Report (Regulation 19)                   |

The full range of environmental receptors as detailed in the SEA Directive have been considered when developing the scope of the SA (see SA Scoping Report (MDSC, 2021) for a full summary description of the scope of the SA).

The Directive states that an assessment should identify the potentially significant impacts on ‘*biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural and archaeological heritage, landscape and the interrelationship between the above factors*’ (see Table 3-2).

Table 3-2: Sustainability topics covered in the Sustainability Appraisal.

| SEA Directive and SA guidance requirements |              | Definition in relation to this SA  |
|--|--------------|--|
| <b>Environmental</b>                       | Landscape    | Local landscape character; protected and notable landscapes; key local landscape features. |
|  | Biodiversity | Designated nature conservation sites; protected  |

| SEA Directive and SA guidance requirements              |   | Definition in relation to this SA   |
|---|---|---|
|   | Flora                                     | and notable species and habitats; trends in condition and status.   |
|   | Fauna                                     |   |
|   | Water                                     | Chemical and biological water quality; surface and groundwater resources; waterbody hydro-morphology; flood risk.   |
|   | Soil (including geology)                  | Variety of rocks, minerals and landforms; the quantity and distribution of high-quality soil; land contamination.   |
|   | Cultural heritage                         | Protected and notable heritage assets and their setting; human induced physical changes to the environment; pressures on the historic environment, heritage assets and their setting. |
|   | Architectural and archaeological heritage |   |
|   | Air                                       | Air quality issues.   |
|   | Climatic factors                          | Regional climate patterns; trends in greenhouse gas emissions and the sources of these emissions; mitigation measures and adaptation options to manage climate change.                |
| <b>Social</b>   | Population                                | Where people live and work; population trends and demographics; housing; education; inequality and deprivation; key community facilities; accessibility.                              |
|   | Human Health                              | Trends and patterns in human health; recreation opportunities.  |
| <b>Economic</b>   | Economy                                   | Local economic and employment conditions.   |
|   | Material assets                           | Critical transport and other infrastructure; community services; green infrastructure and open space.   |
|   | Waste                                     | Waste collection and recycling patterns.  |
| <b>The interrelationship between the above factors.</b> |   | The relationship between environmental features and issues  |

### 3.1.2 Stages in the Sustainability Appraisal process

The ODPM guidance sets out a five-stage process (A to E) to be followed (see Table 3-3). This Environmental Report builds upon the Scoping Report (Stage A) and covers stages B and C of the process wherein the context and objectives of the Sustainability Appraisal are identified, and the scope of the assessment is determined.

Table 3-3: Stages in the SA process.

| SA stages and tasks | Purpose   |  | Where covered in the SA                                      |
|---------------------|---|--|--|
| Stage A             | Setting the context and SA objectives, establishing the baseline and deciding on the scope. |  | SA Scoping Report (MSDC, 2021)                               |
| Stage B             | Developing and refining options and assessing effects                                       |  |  |
|                     | (B1) Test the plan proposals against the SA framework.                                      | To identify potential synergies or inconsistencies between the objectives of the plan and the SA objectives and help in developing alternatives. | SA Environmental Report (Chapters 4 to 8 and Appendices A-D) |
|                     | (B2) Develop the plan options including reasonable alternatives.                            | To develop and refine strategic alternatives.  | SA Environmental Report (Chapters 4 to 8 and Appendices A-D) |
|                     | (B3) Predict the effects of the options, including alternatives.                            | To predict the significant environmental effects of the plan proposals and alternatives.   | SA Environmental Report (Chapters 4 to 8 and Appendices A-D) |
|                     | (B4) Evaluate the likely effects of the plan proposals and alternatives.                    | To predict the effects of the plan proposals and reasonable alternatives and assist in the refinement of the plan.                               | SA Environmental Report (Chapters 4 to 8 and Appendices A-D) |
|                     | (B5) Consider ways of mitigating adverse effects and maximising beneficial effects.         | To ensure that adverse effects are identified, and potential mitigation measures are considered.   | SA Environmental Report (Chapters 4 to 8 and Appendices A-D) |



| SA stages and tasks | Purpose  |   | Where covered in the SA   |
|---------------------|--|---|---|
|                     | (B6) Propose measures to monitor the significant effects of implementing the Local Plan. | To detail the means by which the environmental performance of the plan can be assessed. | SA Environmental Report (Chapter 9).  |
| Stage C             | Preparing the Environmental Report   |   | SA Environmental Report   |
| Stage D             | Consulting on the draft Local Plan and the Environmental Report                          |   | SA Environmental Report (consultation to be undertaken).                                  |
| Stage E             | Monitoring the significant effects of implementing the Local Plan                        |   | SA Environmental Report and Adoption Statement (to be prepared at plan publication stage) |

### 3.1.3 Relationship between the Plan Review and the Sustainability Appraisal

The relationship between the SA process and development of the District Plan (the 'Local Plan') is summarised in Figure 3-1.

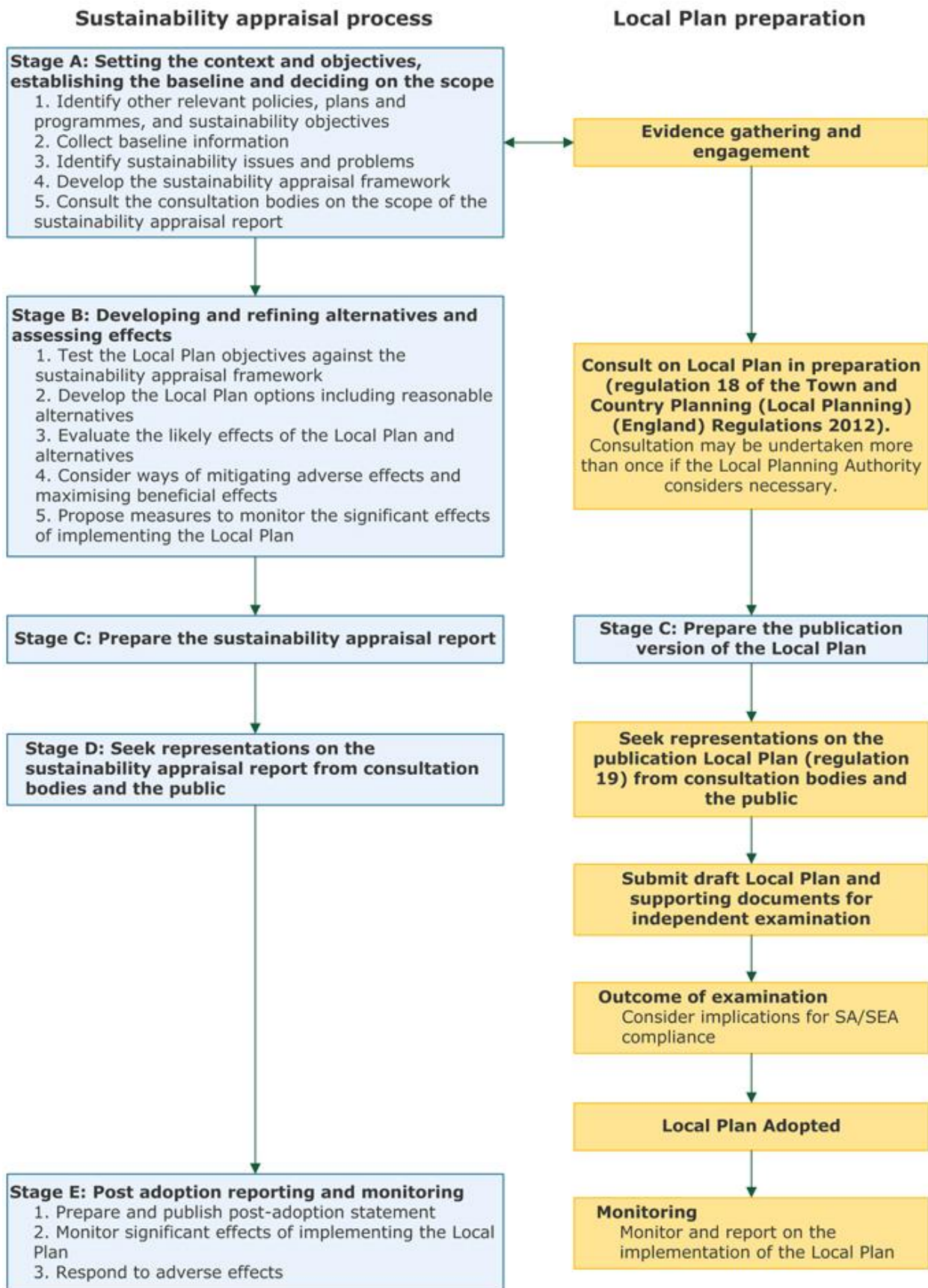


Figure 3-1: Key stages of Local Plan preparation and their link with the Sustainability

Appraisal process (DCLG, 2014).

### **Consultation Draft (Regulation 18)**

The Review of the District Plan is an iterative process involving a staged approach to the development of the final strategic objectives, policies and site allocations contained within the adopted DPR; at each stage in this process, consultation with the public and stakeholders is undertaken to enable wider views to be considered and ensure the final outcomes reflect local priorities.

The Consultation Draft (Regulation 18) stage of the DPR process set out the spatial vision and objectives for Mid Sussex – which together provide the framework for the DPR policies – and its spatial strategy – which examined the key development issues of relevance to Mid Sussex and identified two spatial options for the Plan area to deal with these issues. Consultation with the public and other stakeholders on the Consultation Draft document was undertaken in November and December 2022.

Mid Sussex Council set out its preferred policies and site allocations needed to deliver the plan's vision and objectives in its Consultation Draft (Regulation 18) document. The policies and allocations identified in this document are based upon the findings from the Consultation Draft stage and consider consultee responses to the consultation undertaken at that stage.

The preferred policies seek to deliver the objectives and directly reflect the spatial options set out in the Consultation Draft document; the policies have been developed to deliver the preferred options identified at that stage. SA of the spatial options therefore tested both the preferred option and 'reasonable alternatives' as required by Part 3 of the SEA Regulations. The outcomes of this assessment were set out in the SA Consultation Draft (Regulation 18). Consultation on the outcomes of this work was undertaken alongside the Consultation Draft document.

SA of the preferred policies and any further 'reasonable alternatives' identified by the Council has been undertaken against the SA Framework. Typically, this involved direct assessment of each proposed policy against the SA objectives and then consideration of the assessment outcomes of any related spatial option so as to demonstrate the potential effects had alternative options been taken forward to this Preferred Options stage. For many of the policies, the Council considered that there were no other reasonable policy approaches. This was because any other policy approach would not be in conformity with NPPF requirements, or the preferred policy direction set out in the Consultation Draft document (considering consultee views).

It should be recognised that the SA is not the only aspect considered when determining a preferred option and that other factors including conformity with national policy and public opinion will also be taken into account by the Council.

In addition, the Consultation Draft (Regulation 18) document contains the spatial vision and objectives for Mid Sussex. The 15 objectives, derived from the vision, have remained unchanged from the original District Plan 2014-2031, and the Consultation Draft stage.

## Site Allocations Development Plan Document

The Mid Sussex District Plan sets out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) to allocate housing and employment sites to address the needs identified in the District Plan, to allocate a site for a Science and Technology Park, west of Burgess Hill and to set out additional strategic policies relating to the delivery of sustainable development.

The Council prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) (MSDC, 2023), which assesses the suitability of existing and potential development sites in the area and a Strategic Housing Market Assessment (SHMA). The SHELAA has been undertaken in accordance with the methodology set out in the Planning Practice Guidance accompanying the NPPF. This involves an assessment of each potential development site against a broad range of considerations, including national policy requirements and national and local designations.

The DPR has considered a number of reasonable alternatives including 44 sites, as well as 85 draft policies set out in the DPR (which includes 26 site allocation policies).

### Publication Draft (Regulation 19) DPR

The Publication Draft (Regulation 19) sets out Mid Sussex Council's vision and objectives for the future development of the area, addressing needs and opportunities in the Plan area. It will also be a basis for safeguarding the environment, adapting to climate change, and securing good design. Its policies and site allocations will be used to guide decisions and investment on development and regeneration up to 2039. The policies and allocations in this document have been informed by the Consultation stage and consider consultee responses gathered during the consultation period November 2022 to December 2022, and meetings in March 2023 and June 2023. A summary of the comments received is provided in the evidence base for the Plan.

The preferred spatial vision and objectives have been refined following consultation at the Consultation stage.

The document also ensures that the most up to date available evidence and national planning policy are considered. The subsequent changes underwent a further SA utilising the SA framework and sites assessment criteria to determine if there were significant changes to the SA conclusions previously drawn.

A summary of how the DPR has emerged and the appraisal of reasonable alternatives is outlined in Table 3-4.

Table 3-4: Summary of SA and development of the DPR and reasonable alternatives.

| Date                     | DPR Stage                    | Sustainability Appraisal  |
|--------------------------|------------------------------|---|
| November 2021            | Evidence Gathering           | <b>Mid Sussex District Council DPR: Sustainability Appraisal Scoping Report</b><br>This report reviews the key issues in relation to social, economic and environmental factors across the Mid Sussex plan area. These issues feed into the development of the SA Framework which sets out 14 criteria for the assessment of the sustainability performance of the plan options |
| October 2022             | Consultation Draft (Reg 18)  | <b>Sustainability Appraisal: Regulation 18</b><br>The DPR has considered reasonable alternatives including two spatial options and 44 sites, which were assessed within the Regulation 18 SA Report, as well as 85 draft policies set out in the DPR (which includes 26 site allocation policies).  |
| November - December 2022 | Consultation on Reg 18 stage | A total of 2,882 comments were made on the Consultation Draft (Regulation 18) and associated documents, of which 22 comments were directly on the Sustainability Appraisal.   |
| November 2023            | Publication Draft (Reg 19)   | This is the current stage of district plan preparation which is being assessed in this Sustainability Appraisal.  |

### 3.2 Sustainability Appraisal Framework

The SA framework is used to identify and evaluate the potential sustainability effects associated with the implementation of the DPR. Developed at the SA scoping stage (see SA Scoping Report (MSDC, 2021) for further details on the development of the SA framework), the SA Framework is comprised of SA Objectives, decision-making criteria, and monitoring indicators. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations. Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust, and thorough.

It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. To focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of reasonable alternatives. Table 3-5 summarises the purpose

and requirements of the SA objectives, appraisal criteria, and indicators.

Table 3-5: Definition of Sustainability Appraisal objectives, appraisal criteria, and monitoring indicators

| Item                 | Purpose   |
|----------------------|---|
| Objective            | Provide a benchmark ‘intention’ against which the sustainability effects of the plan can be tested. They need to be fit-for-purpose and represent the key sustainability issues of relevance to the District Plan area. |
| Appraisal question   | Aid the assessment of impact significance. Provide a means of ensuring that key environmental and sustainability issues are considered by the assessment process.   |
| Monitoring indicator | Provides a means of measuring the progress towards achieving the sustainability objectives over time. Needs to be measurable and relevant and ideally relies on existing monitoring networks.                           |

### 3.2.1 Sustainability Appraisal objectives and appraisal criteria

Sustainability Appraisal objectives and appraisal criteria have been developed for each of the sustainability receptors (see Table 3-6). The spatial strategy, proposed policies and site allocations have been assessed directly against these SA objectives to determine whether they have the potential to contribute towards or conflict with the achievement of each objective.

The SA objectives and appraisal questions were informed and developed through the baseline appraisal undertaken during the scoping process and the key environmental protection and sustainability themes identified by the plans, programmes, and policies (PPP) review. These objectives were revised in response to comments received during the consultation phase on the SA Scoping Report (MSDC, 2021) and considering additional baseline information.

The SA Framework was used by Lepus Consulting to assess the spatial options, policies and site allocations at the Consultation Draft (Regulation 18) stage of the DPR. Public consultation on these stages of the DPR, including the accompanying SA Report, were undertaken by Mid Sussex District Council in 2022, and no substantive comments on the SA Framework were received, indicating that the consultees, including the statutory consultees, considered the framework to be appropriate for the assessment of the DPR.

Further review of the SA framework was undertaken at this Publication Draft (Regulation 19) stage as part of the wider review of the sustainability context (see Chapter 2). However, the framework is considered to be robust, and no substantive changes have been made since the Consultation Draft stage.

Table 3-6: Sustainability Appraisal objectives, appraisal criteria and monitoring indicators for Mid Sussex.

| SA receptor   | SA objective   | Appraisal question: will the approach / proposal help to...   | Monitoring indicators   |
|---|--|---|---|
| Human Health; Population; Material Assets                             | 1<br><b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.                     | 1.1. Meet the housing requirement of the whole community, including of older people?<br>1.2. Deliver a range of type, tenures and mix of homes the District needs over the plan period?<br>1.3. Increase the supply of affordable homes?<br>1.4. Provide for the housing need of an ageing population?<br>1.5. Meet Gypsy and Traveller accommodation needs?  | Housing completions (net).<br>Affordable housing completions (gross).<br>Affordable housing contributions received.<br>Number of households on the housing needs register.<br>Number of households accepted as full homeless.<br>House price to earnings ratio.<br>Net additional Gypsy and Traveller pitches.<br>Number of C2 provision.   |
| Biodiversity; Flora; Fauna; Human Health; Population; Material Assets | 2<br><b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. | 2.1. Provide for additional facilities to support the need of new and growing communities?<br>2.2. Improve access to health care facilities and social care services?<br>2.3. Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure, and recreation and sport facilities?<br>2.4. Promote healthy lifestyle choices by encouraging and facilitating walking and | Number of applications resulting in new, extended or improved health Facilities.<br>Number of households within a 15-minute walk (approx. 1.2km) from GP surgery / health centre / hospital.<br>Number of households within 300m of leisure and open space facilities (as defined in the Open Space study).<br>Hectares of accessible open space per 1,000 population.<br>Financial contributions towards leisure |

| SA receptor                                     | SA objective |   | Appraisal question: will the approach / proposal help to...   | Monitoring indicators   |
|---|--------------|---|---|---|
|   |              |   | cycling?<br>2.5. Support special needs and an ageing population?<br>2.6. Increase access to leisure and open space facilities including in the countryside?<br>2.7. Provide a range of play space for children and young people?  | facilities received.<br>Financial contributions towards health received.<br>Amount of additional community facilities delivered.<br>Percentage of population not in good health.  |
| Human Health;<br>Population;<br>Material Assets | 3            | <b>Education:</b> 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 | 3.1. Improve qualifications and skills of young people and adults?<br>3.2. Provide an adequate range of education and childcare facilities?<br>3.3. Contribute to meeting primary, secondary and post 19 education needs?   | Percentage of population of working age qualified to at least NVQ level 3 (or equivalent).<br>Percentage of adults with poor literacy and numeracy skills.<br>Number of households within a 15-minute walk (approx. 1.2km) from a Primary School.                     |
| Human Health;<br>Population;<br>Material Assets | 4            | <b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration                             | 4.1. Reduce crime / fear of crime and anti-social activity?<br>4.2. Promote design that discourages crime?<br>4.3. Promote sustainable mixed-use environments?<br>4.4. Improve access to community facilities?<br>4.5. Maintain existing community facilities and encourage the delivery of new ones? | All crime – number of crimes per 1000 residents per annum.<br>Number of domestic burglaries per 1,000 households.<br>Number of dwellings permitted more than 150m from a built-up area boundary.<br>Number of households within a 15-minute walk (approx. 1.2km) from |



| SA receptor  | SA objective |  | Appraisal question: will the approach / proposal help to...   | Monitoring indicators   |
|--|--------------|--|---|---|
|  |              | within existing town/village and retain their separate identities.   |   | community facilities (e.g., community hall, place of worship, library).<br>Number of applications resulting in a loss of community facilities (e.g., shop, pub, place of worship, etc.).  |
| Climatic Factors;<br>Human health;<br>Biodiversity;<br>Flora; Fauna;<br>Material Assets; Water | 5            | <b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources  | 5.1. Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?<br>5.2. Promote the use of Natural Flood Management schemes, SuDS and flood resilient design?<br>5.3. Incorporate sustainable design and construction techniques?                 | Percentage of the District that is within Flood Zone 2/Flood Zone 3.<br>Number of properties at risk from flooding, as defined by the Environment Agency.<br>Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds.<br>Number of developments with sustainable drainage systems. |
| Soil; Material Assets  | 6            | <b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban | 6.1. Support the redevelopment of previously developed land?<br>6.2. Make best use of land?<br>6.3. Encourage the construction of more sustainable homes?<br>6.4. Minimise the loss of open countryside to development?<br>6.5. Minimise the loss of the best and most versatile agricultural land to development?<br>6.6. Maintain and enhance soil quality? | Percentage of new and converted homes developed on brownfield land.<br>Percentage of new employment floorspace on previously developed land.<br>Average density of new housing developments.<br>Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development.   |

| SA receptor  | SA objective |  | Appraisal question: will the approach / proposal help to...  | Monitoring indicators  |
|--|--------------|--|--|--|
|  |              | renaissance.   |  | Amount of empty homes.   |
| Biodiversity;<br>Flora; Fauna  | 7            | <b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity | <p>7.1. Avoid adverse effects on internationally and nationally designated biodiversity and geodiversity assets within an outside the District?</p> <p>7.2. Avoid adverse effects on locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland?</p> <p>7.3. Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?</p> <p>7.4. Provide and manage the opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?</p> | <p>Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District.</p> <p>Area of ancient woodland within the District.</p> <p>Condition of internationally and nationally important wildlife and geological sites (Sites of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) &amp; Ramsar).</p> <p>Number of planning applications approved contrary to advice given by Natural England on biodiversity issues.</p> <p>Number of dwellings permitted within the 7km Zone of Influence (SPA).</p> <p>Capacity of Suitable Accessible Natural Greenspace (SANG).</p> <p>Net gain in biodiversity.</p> |
| Landscape;<br>Cultural Heritage;<br>Architectural and<br>Archaeological Heritage | 8            | <b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and    | <p>8.1. Conserve and enhance the High Weald AONB?</p> <p>8.2. Conserve and enhance the settings of the South Downs National Park?</p> <p>8.3. Protect and enhance settlements and their settings within the landscape across</p>   | <p>Open spaces managed to green flag standard.</p> <p>Number of applications approved contrary to advice from the High Weald AONB unit or the South Downs National Park Authority.</p>   |

| SA receptor | SA objective |  | Appraisal question: will the approach / proposal help to...   | Monitoring indicators  |
|-------------|--------------|--|---|--|
|             |              | ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place | <p>the district?</p> <p>8.4. Protect and enhance landscape character?</p> <p>8.5. Promote high quality design in context with its rural and urban landscape?</p> <p>8.6. Maintain and where possible increase accessibility to the countryside and more generally to open spaces?</p> | <p>Amount of new development (units) within the High Weald AONB.</p> <p>Number of households within 300m of multi- functional green space (as defined in the Mid Sussex Assessment of Open Space).</p> <p>Hectares of accessible open space per 1000 population.</p> <p>Amount of rights of way.</p> <p>Number of new dwellings approved on low/negligible sites in the Plan.</p> <p>Area as identified in the Landscape Capacity Study.</p> |

| SA receptor   | SA objective |  | Appraisal question: will the approach / proposal help to...   | Monitoring indicators  |
|---|--------------|--|---|--|
| Cultural Heritage;<br>Architectural and<br>Archaeological Heritage                                | 9            | <b>Cultural heritage:</b><br>To protect, enhance and make accessible for enjoyment, the District's historic environment.   | 9.1. Protect, enhance and restore buildings, monuments, sites, places, areas and landscape of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?<br>9.2. Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?<br>9.3. Reduce the number of buildings at risk?<br>9.4. Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies?<br>9.5. Enhance accessibility to cultural heritage assets? | Number of Listed Buildings in the District.<br>Number of Conservation Areas in the District.<br>Number of Conservation Areas with appraisals and management proposal.<br>Number of heritage assets recorded as 'at risk'.  |
| Material Assets;<br>Climatic Factors;<br>Landscape;<br>Population;<br>Human Health; Air;<br>Fauna | 10           | <b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services | 10.1. Develop more efficient land use patterns that minimise the need to travel by car through the location and design of new development and place which provide more opportunities for active travel for the provision and link to public transport infrastructure?<br>10.2. Reduce CO2 emissions to contribute to identified national targets?<br>10.3. Improve accessibility to work and services by public transport, walking and cycling?   | Car ownership.<br>Number of households within a 5-minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour).<br>Number of households within a 10-minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)<br>Number of households within a 15-minute walk (approx. 1.2km) of a train Station.<br>Proportion of journeys to work other |

| SA receptor | SA objective |  | Appraisal question: will the approach / proposal help to...   | Monitoring indicators   |
|-------------|--------------|--|---|---|
|             |              | <p>across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p> | <p>10.4. Protect and improve air quality?<br/>           10.5. Avoid exacerbating existing air quality issues in designated AQMAs?<br/>           10.6. Achieve a healthy living environment?</p> | <p>than by car.<br/>           Percentage of residents living and working within Mid Sussex.<br/>           Monetary investment in sustainable transport schemes (value of s.106 agreements).<br/>           Number of Air Quality Management Areas (AQMAs) within the District.<br/>           Change in CO2 emissions from transport.<br/>           Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore / town centre / high street shopping facilities).<br/>           Number of households within 30min by public transport, or 15min by walking or cycling journey time from a convenience store.</p> |

| SA receptor   | SA objective |   | Appraisal question: will the approach / proposal help to...   | Monitoring indicators  |
|---|--------------|---|---|--|
| Climatic Factors;<br>Material Assets                        | 11           | <b>Energy and waste:</b><br>To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal. | 11.1. Reduce energy consumption?<br>11.2. Reduce waste generated per head of population?<br>11.3. Increase rate per head of population of waste reuse and recycling?<br>11.4. Encourage recycling (including building materials)?<br>11.5. Incorporate sustainable design and construction techniques?  | Domestic energy consumption per household.<br>Number of renewable energy installations within Mid Sussex.<br>Installed capacity of renewable energy installations within Mid Sussex.<br>Domestic waste produced per head of population.<br>Percentage of domestic waste that has been recycled.  |
| Water;<br>Biodiversity;<br>Flora; Fauna;<br>Material Assets | 12           | <b>Water resources:</b><br>To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  | 12.1. Protect and enhance water resources?<br>12.2. Support the achievement of Water Framework Directive targets?<br>12.3. Promote sustainable use of water?<br>12.4. Maintain water availability or water dependant habitats?<br>12.5. Support the provision of sufficient water supply and treatment infrastructure?<br>12.6. Incorporate sustainable design and construction techniques? | Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate".<br>Stretches of watercourse with no deterioration in Water Framework Directive status.<br>Incidents of major and significant water pollution within the District.<br>Number of planning applications approved contrary to advice given by the EA on water quality issues.<br>Number of developments that minimise water consumption. |

| SA receptor   | SA objective  | Appraisal question: will the approach / proposal help to...  | Monitoring indicators  |
|---|---|--|--|
| Population;<br>Material<br>Assets                     | 13<br><b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres. | 13.1. Protect key retail areas?<br>13.2. Encourage rural diversification?<br>13.3. Make land available for business development?<br>13.4. Increase the range of employment opportunities, shops and services available in the town centres across the district?<br>13.5. Decrease the number of vacant units in town centres?<br>13.6. Enhance the viability and vitality of the District's town centres?<br>13.7. Improve access to the District's town centres and services?<br>13.8. Enhance the local distinctiveness in the town centres?<br>13.9. Provide new or improved leisure, recreational or cultural activities?<br>13.10. Maintain or increase the amount of floorspace provided for town centre uses within the town centres? | Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2).<br>Number of households within a 15-minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities).<br>Retail unit vacancy rate.<br>Total amount of new commercial / business floorspace in rural areas.<br>Number of vacant sites brought back into use in Town Centres.<br>Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore / town centre / high street shopping facilities). |
| Human<br>Health;<br>Population;<br>Material<br>Assets | 14<br><b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and   | 14.1. Improve business development and enhance competitiveness?<br>14.2. Improve the resilience of business and the economy?<br>14.3. Promote growth in key sectors?<br>14.4. Reduce out commuting?  | Net increase/decrease in commercial (Use Classes E, B2, B8) and office (E) floorspace.<br>Number of businesses within the District.<br>Number of new businesses setting up in  |

| SA receptor | SA objective |   | Appraisal question: will the approach / proposal help to...   | Monitoring indicators  |
|-------------|--------------|---|---|--|
|             |              | stable levels of employment including the opportunity for people to live and work within their communities. | 14.5. At least maintain and possibly improve employment rate across the District?<br>14.6. Increase the range of employment opportunities?<br>14.7. Facilitate the provision of good quality infrastructure to promote economic growth? | the District.<br>Percentage of Mid Sussex residents who are employed.<br>Percentage of Mid Sussex residents who are economically active.<br>Average weekly income (gross) for those who are employed in the District.<br>Percentage of residents living and working within Mid Sussex.<br>Job density (ratio of jobs to working age population). |



### 3.3 Assessing impacts and impact significance of options, policies, and sites

The unmitigated impacts of the District Plan spatial strategy, proposed policies and site allocations have been identified through analysis of the baseline conditions, key sustainability issues and use of professional judgement to identify a potential significance of effect.

Significance of effect is a combination of sensitivity and impact magnitude. Sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

#### 3.3.1 Sensitivity

Receptor sensitivity has been measured through consideration of how the receiving environment may be affected by a plan. This includes assessment of the value and vulnerability of the receiving environment, whether environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes. A guide to the range of scales used in determining sensitivity is presented in Table 3-7. For most receptors, sensitivity increases with geographic scale.

Table 3-7: Impact sensitivity.

| Scale                    | Typical criteria   |
|--------------------------|--|
| International / national | Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension. |
| Regional                 | This includes the regional and sub-regional scale, including county-wide level and regional areas.   |
| Local                    | This is the district and neighbourhood scale.  |

#### 3.3.2 Impact magnitude

Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined based on the susceptibility of a receptor to the type of change (see Table 3-8).

Table 3-8: Impact magnitude.

| Impact magnitude | Typical criteria  |
|------------------|---|
| High             | <ul style="list-style-type: none"> <li>• Likely total loss of or major alteration to the receptor in question;</li> <li>• Provision of a new receptor/feature; or</li> <li>• The impact is permanent and frequent.</li> </ul> |

| Impact magnitude | Typical criteria  |
|------------------|---|
| Medium           | Partial loss/alteration/improvement to one or more key features; or the impact is one of the following: <ul style="list-style-type: none"> <li>• Frequent and short-term;</li> <li>• Frequent and reversible;</li> <li>• Long-term (and frequent) and reversible;</li> <li>• Long-term and occasional; or</li> <li>• Permanent and occasional.</li> </ul> |
| Low              | Minor loss/alteration/improvement to one or more key features of the receptor; or the impact is one of the following: <ul style="list-style-type: none"> <li>• Reversible and short-term;</li> <li>• Reversible and occasional; or</li> <li>• Short-term and occasional.</li> </ul>   |

### 3.3.3 Significant effects

A single value from Table 3-9 has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

Table 3-9: Impact significance key.

| Impact significance   | Impact symbol                      |
|---|------------------------------------|
| The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>• Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;</li> <li>• Cause a very high-quality receptor to be permanently diminished;</li> <li>• Be unable to be entirely mitigated;</li> <li>• Be discordant with the existing setting; and/or</li> <li>• Contribute to a cumulative significant effect</li> </ul> | <b>Major negative</b><br><b>--</b> |
| The size, nature and location of development proposals would be likely to: <ul style="list-style-type: none"> <li>• Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>• Affect undesignated yet recognised local receptors.</li> </ul>  | <b>Minor negative</b><br><b>-</b>  |
| Either no impacts are anticipated, or any impacts are anticipated to be negligible.   | <b>Negligible</b><br><b>0</b>      |

| Impact significance  | Impact symbol               |
|--|-----------------------------|
| It is entirely uncertain whether impacts would be positive or adverse.   | <b>Uncertain</b><br>+ / -   |
| The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>• Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>• Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>• Enable the restoration of valued characteristic features.</li> </ul>  | <b>Minor positive</b><br>+  |
| The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• Restore valued receptors which were degraded through previous uses; and/or</li> <li>• Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.</li> </ul> | <b>Major positive</b><br>++ |

The spatial options have been evaluated in light of their potential cumulative, synergistic and indirect effects on the SA objectives. The assessment of these effects has been informed by the baseline data collected at the scoping stage, professional judgement, and experience with other SEAs/SAs, as well as an assessment of national, regional, and local trends.

When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the modal score has been taken. Where there is not a clear modal score, a precautionary principle has been used. This is a worst-case scenario approach. For example, if a positive effect is identified in relation to one criterion within the SA Framework and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summaries and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option. This approach has been applied to both the new reasonable alternative sites assessed during this Regulation 19 SA and the update.

Within the reasonable alternative site assessments, presented in Appendix C, the likely sustainability impacts are presented per ‘receptor’ within each SA Objective, offering further granularity in the presentation of effects.

The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline). The level of effect has been categorised as minor or major. Table 3-9 sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.

Each reasonable alternative option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per Table 3-9.

### **3.4 SEA Topic methodologies and assumptions**

Several topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives, as outlined by Lepus Consulting during the Regulation 18 SA. These methodologies and assumptions have also been applied to this Regulation 19 SA for consistency.

The following should be borne in mind when considering the assessment findings.

#### **3.4.1 SA Objective 1: Housing**

MSDC has prepared evidence documents in relation to establishing housing needs over the Plan period. This includes a Strategic Housing and Employment Land Availability Assessment (SHELAA) (MSDC, 2023) and a Strategic Housing Market Assessment (SHMA), as well as a Site Selection Process. Options are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area.

When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets, and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions, and community stability.

Development proposals which would result in an increase of 99 dwellings or less would be likely to have a minor positive impact on the local housing provision. Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision.

Unless otherwise stated, it is assumed development options will provide a good mix of housing type and tenure opportunities.

Development proposals which would be expected to result in a net loss of housing across the Plan area would be expected to have an adverse impact on MSDC's ability to meet the required housing demand.

Development proposals which would result in the loss of nine dwellings or less would be likely to have a minor negative impact on local housing provision. Development proposals

which would result in the loss of ten dwellings or more would be likely to have a major negative impact on the local housing provision.

Development proposals which would result in no net change in dwellings would be expected to have a negligible impact on the local housing provision.

Development proposals that seek to meet the housing needs for the whole community, including older people, Gypsy and Traveller communities, and those which would increase the supply of affordable homes, would be likely to have a positive impact on this SA Objective.

### 3.4.2 SA Objective 2: Health and Wellbeing

It is assumed that development proposals located near main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road (DMRB, 2007). Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution. For the purposes of this assessment, main roads were identified using the Major Road Network dataset published by the Department for Transport (2021).

Air Quality Management Areas (AQMAs) are areas where the national air quality objectives will not be met. Development proposals located within 200m of a main road or AQMA would be expected to have a minor negative impact on site end users' exposure to air pollution. Development proposals located over 200m from a main road and AQMA would be expected to have a minor positive impact on site end users' exposure to air pollution.

To facilitate healthy and active lifestyles for existing and new residents, it is expected that the MSDPR should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of accessible natural habitats and the surrounding PRow network. Sustainable distances to NHS hospitals and leisure centres are derived from Barton et al (2010).

Adverse impacts are anticipated where the proposed development would not be expected to facilitate active and healthy lifestyles for current or future residents.

For the purposes of this assessment, accessibility to a hospital has been taken as proximity to emergency health facilities, therefore proximity to an NHS hospital with an Accident and Emergency service. Distances of sites to other NHS facilities (e.g., community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. There are two NHS hospitals with an A&E department within the Plan area: Queen Victoria Hospital, East Grinstead, located in the north east and Princess Royal Hospital, Haywards Heath, located in the south east of the Plan area.

Development proposals located within 5km of one of these hospitals would be expected to have a minor positive impact on site end users' access to emergency health services. Development proposals located over 5km from these hospitals would be likely to have a minor negative impact on site end users' access to emergency health care.

There are numerous GP surgeries located across the Plan area. Travel time data provided by MSDC has been used to inform this assessment. Development proposals located within a 10-minute walk of a GP surgery would be expected to have a major positive impact on site end users' access to this essential health service and those within a 15-minute walk are likely to have a minor positive impact. Development proposals located within a 20-minute walk would have a negligible impact. Development proposal located over a 20-minute walk from a GP surgery would be likely to have a minor negative impact on site end users' access to essential health care.

Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. Development proposals located within 1.5km of a leisure centre would be expected to have a minor positive impact on site end users' access to these facilities. Development proposal located over 1.5km from a leisure centre would be likely to have a minor negative impact on site end users' access to these facilities.

New development sites have been assessed in terms of their access to the local PRow networks and public greenspace. In line with Barton et al. (2010), a sustainable distance of 600m has been used for access to a PRow. Development proposals that are located within 600m of a PRow would be expected to have a minor positive impact on pedestrian accessibility and access to the countryside. Development proposals located over 600m from a PRow could potentially have a minor negative impact on site end users' access to natural habitats, and therefore have an adverse impact on the physical and mental health of local residents.

By siting residential developments near open greenspace and outdoor play spaces, a number of mental and physical benefits can result. A minor positive impact is expected for development proposals located within 300m of open greenspace (as per the Council provided threshold), and a minor negative impact could be expected for development proposals located outside of 300m from these facilities.

### 3.4.3 SA Objective 3: Education

It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills, and qualifications of residents.

The Council have identified that development proposals within a 20-minute walk to a primary school are in a sustainable location to these facilities. Travel time data provided by MSDC has been used to inform this assessment. In line with Barton et al.'s (2010) sustainable distances, for the purpose of this assessment, 1.5km is considered as the sustainable distance to a secondary school and 3km to a further education facility. All schools identified are publicly accessible state schools.

Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances. To this end, (and given their age) this is predominantly on public transport such as bus / train or dedicated school

bus services. MSDC's site selection process therefore places more weight on the Primary School criteria as these should be located at a distance more accessible by foot / cycle / walking clubs / lift-share.

It is recognised that not all schools within Mid-Sussex are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all. Local primary schools may only be Infant or Junior schools and therefore not provide education for all children of primary school age. Some secondary schools may only be for girls or boys and therefore would not provide education for all. This has been considered within the assessment.

At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.

There are numerous primary schools located across the Plan area. Travel time data provided by MSDC has been used to inform this assessment. Development proposals located within a 10-minute walk of a primary school would be expected to have a major positive impact on site end users' access to this essential health service and those within a 15-minute walk are likely to have a minor positive impact. Development proposals located within a 20-minute walk would have a negligible impact. Development proposal located over a 20-minute walk from a primary school would be likely to have a minor negative impact on site end users' access to essential health care.

Development proposals which would locate site end users within the target distance (1.5km) of a secondary school would be expected to have a minor positive impact for this objective. Development proposals which would locate site end users outside of the target distance of a secondary school would be expected to have a minor negative impact for this objective.

Development proposals which would locate new residents within the target distance to both a primary and secondary school would be expected to have a major positive impact on the education objective.

Development proposals which would locate new residents outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.

#### 3.4.4 SA Objective 4: Community and Crime

Sustainable access to community facilities, including libraries, banks, and retail areas, is identified by the Council as being within a 15-minute walk from a proposed residential site, or 30 minutes via public transport. Travel time data provided by MSDC has been used to inform this assessment.

Development proposals within a 10-minute walk or public transport journey from community facilities could expect a major positive impact on this objective, providing excellent access to these facilities. Sites which are located within 15 minutes' walk or 30 minutes public

transport from community facilities are expected to have a minor positive impact on future residents' access to these facilities.

Development proposals which would locate new residents outside of the target travel times to community facilities would be expected to have a minor negative impact on the community and crime objective.

Additionally, development proposals located over 150m from a Built-Up Area Boundary (BUAB) would be expected to have a minor negative impact on the community and crime objective.

Development proposals which would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area would be expected to result in a positive impact for this objective, through helping to address inequality and promote safe and inclusive communities.

### 3.4.5 SA Objective 5: Flooding and Surface Water

The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data (EA, 2023), such that:

- Flood Zone 3: 1% or greater chance of flooding each year;
- Flood Zone 2: Between 0.1% - 1% chance of flooding each year; and
- Flood Zone 1: Less than 0.1% chance of flooding each year.

It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding.

Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected. Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation.

According to Environment Agency (EA, 2021), areas determined to be at high risk of pluvial flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance. Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on pluvial flooding for the purposes of this assessment.

Development proposals located in areas at low and medium risk of surface water flooding would be expected to have a minor negative impact on pluvial flooding. Development proposals located within areas at high risk of surface water flooding would be expected to have a major negative impact on pluvial flooding.

Where development proposals are not located in areas determined to be at risk of pluvial flooding, or where the level of flood risk is considered to be insignificant in proportion to the total site area, a negligible impact would be expected for climate change adaptation.



It is assumed that development proposals will be in perpetuity, and it is therefore likely that development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

### 3.4.6 SA Objective 6: Natural Resources

#### Previously Developed Land

In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Mid Sussex, and therefore, have a minor positive impact on this objective.

Development proposals situated wholly or partially on previously undeveloped land would be expected to pose a threat to soil within the site perimeter due to excavation, compaction, erosion and an increased risk of pollution and contamination during construction.

In addition, development proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective.

#### Agricultural Land Classification

The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land (Natural England, 1988). In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land.

Adverse impacts are expected for development proposals which would result in a net loss of agriculturally valuable soils. Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan area's BMV land, would be expected to have a negative impact for this objective.

For this report, a 20ha threshold has been used based on available guidance (Natural England, 2009). Development proposals which would result in the loss of less than 20ha of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to

have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a major negative impact on this objective.

Development proposals which are situated on Grade 4 and 5 ALC land would be expected to have a negligible impact on natural resources. Development proposals on land classified as 'urban' or 'non-agricultural' would help prevent the loss of the Plan area's BMV land, and therefore, would be expected to have a minor positive impact for this objective.

### Water Consumption

It is assumed that development proposals will be in accordance with the higher optional water efficiency standard of 110 litres per person per day, as set out in the Building Regulations 2010, in accordance with the current adopted District Plan policy.

It is assumed that all housing proposals in the MSDPR will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

### Minerals

Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSA). Identified MSAs within Mid Sussex include the following minerals resources: brick clay; chalk; consolidated bedrock; unconsolidated gravel; and unconsolidated sand.

Where a development proposal coincides with an identified MSA, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals will be inaccessible for potential extraction in the future. For the purposes of this assessment, this would result in a minor negative impact under the natural resources SA objective.

#### 3.4.7 SA Objective 7: Biodiversity and Geodiversity

The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. Receptors include the following:

##### Designated Sites:

- Habitats sites: Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites
- Sites of Special Scientific Interest (SSSI)
- National Nature Reserves (NNR)
- Local Nature Reserves (LNR)
- Local Wildlife Sites (LWS)

## Habitats and Species:

- Ancient woodland
- Priority habitats
- Open mosaic habitats
- Veteran trees

Where a development proposal is coincident with, adjacent to or located in proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

Negative impacts would be expected where the following ecological designations may be harmed or lost because of proposals: SPAs, SACs, Ramsar sites, SSSIs, ancient woodlands, NNRs, LNRs and LWSs as well as priority habitats protected under the 2006 NERC Act. The assessment is largely based on a consideration of the proximity of a site to these ecological receptors.

For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England's publicly available Priority Habitat Inventory database. It is acknowledged that this may not reflect current local site conditions in all instances.

It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 6) in this assessment.

It should be noted that no detailed ecological surveys have been completed by JBA Consulting or Lepus Consulting during the Regulation 18 phase to inform the assessments made in this report.

Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. Consequently, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.

It is anticipated that MSDC will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act. It is assumed that mature trees and hedgerows will be retained where possible. Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country.

IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Where a site falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment. The IRZ attribute data draws a distinction between rural and non-rural development. For the purposes of this assessment non-rural sites are considered to be those that are located within an existing built-up area. Sites at greenfield locations at the edge of a settlement or those that are more rural in nature have been considered to be rural.

A 7km zone of influence (Zol) has been identified around Ashdown Forest SAC/SPA within which planning applications for residential development will need to mitigate the potential impacts of the development to ensure the effects of any increase in visitors to Ashdown Forest are addressed. For the purposes of this assessment, it is assumed that development within this 7km zone could potentially result in a minor negative impact on the designation.

An HRA was prepared by AECOM alongside the development of the Plan to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. No Habitats sites other than Ashdown Forest SPA / SAC currently have an identified Zone of Influence (Zol) within Mid Sussex District. The Regulation 18 HRA explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA / SAC and Castle Hill SAC and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and recreational pressure. The results of this HRA AA have been used to inform this Regulation 19 SA.

Where development proposals coincide with a Habitats site, a SSSI, NNR, ancient woodland, or are adjacent to a Habitats site or SSSI it is assumed that development would have a permanent and irreversible impact on these nationally important biodiversity assets, and a major negative impact would be expected.

Where development proposals coincide with LNRs, LWSs, priority habitats, open mosaic habitats, are located within a SSSI IRZ which states to consult Natural England or are located within a defined Zol of a Habitats site, NNR, LNR, LWS or stand of ancient woodland, a minor negative impact would be expected.

An assessment of potential impacts on veteran trees has been informed by comments from the Tree Officer on sites considered as part of the Site Selection Process. Development proposals which coincide with a veteran tree could potentially result in the irreversible loss

of the asset, and therefore have a major negative impact. Development proposals which are located adjacent to a veteran tree could potentially result in a minor negative impact.

Where a site proposal would not be anticipated to impact a biodiversity asset, a negligible impact would be expected for this objective.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

#### 3.4.8 SA Objective 8: Landscape

Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed proposals for each development proposal are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

Where a development proposal would not be anticipated to impact a designated or local landscape, a negligible impact would be expected for this objective.

#### The High Weald AONB

The High Weald Area of Outstanding Natural Beauty (AONB) is a nationally designated landscape. The High Weald AONB is partially located within Mid Sussex District to the north, covering almost half of the district area.

Objective OQ3 of the High Weald AONB Management Plan 2019 – 2024 (High Weald JAC, 2019) aims "*to develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty*". The assessment of potential impacts on the AONB arising from development has been informed by comments from specialist landscape officers (provided by the Council) during the Regulation 18 stage and the Landscape Capacity Study. Development proposals which are coincident with and have been identified as likely to cause a 'high' impact to this AONB would be likely to alter the character of the nationally designated landscape and therefore, a major negative impact would be expected. Development proposals within the AONB with identified 'moderate' impacts are assessed as having the potential for major negative impacts on the setting of the AONB. Development proposals which are near the AONB and are identified as having 'low' to 'low / medium' capacity could potentially result in a minor negative impact on the setting of the nationally designated landscape. In some instances where proposed sites coincide with areas of 'high' impact on the AONB, the site

has been concluded as likely 'major development' as described in the NPPF paragraph 177.

### South Downs National Park

Development proposals which coincide with or are located adjacent or near the South Downs National Park, and therefore could potentially adversely affect views from the National Park and / or alter its setting, would be expected to have a minor negative impact on the landscape objective.

### Country Park

Development proposals which are located adjacent to or near Country Parks, and therefore could potentially adversely affect views from Country Parks, would be expected to have a minor negative impact on the landscape objective.

### Views

Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network or National Trails would be expected to have a minor negative impact on the landscape objective.

To consider potential visual effects of development, it has been assumed that the proposals would broadly reflect the character of nearby development of the same type. Potential views from residential properties are identified through reference to aerial mapping and the use of Google Maps.

It is anticipated that MSDC will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the site and its surroundings, the views available towards the site, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

### Urbanisation of the Countryside / Coalescence

Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.

Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements would be expected to have a potential minor negative impact on the landscape objective.

### Multi-Functional Greenspace

Development proposals located within 300m of areas designated as multi-functional greenspace (MFGS) and open playspace are likely to provide good access to natural open

space for future residents and therefore a minor positive impact on the landscape objective would be expected.

### Tree Preservation Orders

It is anticipated that development proposals which coincide with trees which are registered under Tree Preservation Orders (TPOs) could have adverse impacts on these trees and their protected status, resulting in a minor negative impact for this objective due to potential impacts on landscape settings.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

### 3.4.9 SA Objective 9: Cultural Heritage

Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.

Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens, and Conservation Areas. It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the MSDPR). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

### Setting

Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale, or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.

### Heritage Assets

The site assessments for Listed Buildings and Conservation Areas are based on the levels of harm which the developments may have on these assets, as identified within the Site Selection Conclusions Paper provided by the Council. Where a site coincides with or is near a Listed Building or Conservation Area and is identified as having the potential to have

'substantial' levels of harm and a 'harmful impact', a major negative impact on the historic environment would be expected.

Where a site coincides with or is near a Listed Building or Conservation Area and is identified as having the potential to have 'less than substantial' levels of harm, and a 'high' or 'medium' impact, a minor negative impact on the historic environment would be expected.

Where a site coincides with or is near a Listed Building or Conservation Area and is assessed as having the potential to have 'less than substantial' levels of harm and a 'low' impact, or where development proposals are not located near any heritage asset / the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact on the historic environment would be expected.

Where an SM or Registered Park and Garden coincides with a site proposal, it is assumed that the setting of these features will be permanently altered, and a major negative impact would be expected.

Where the site lies adjacent to, or near, an SM or a Registered Park and Garden, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact would therefore be expected.

Archaeological Notification Areas (ANAs) have been identified within Mid Sussex. The assessment of RA sites has been informed through reference to the Site Selection process and comments from a Mid Sussex County Archaeologist during the Regulation 18 stage. Where development has been identified as resulting in 'severe' impacts on archaeological features, a major negative impact on the historic environment would be expected. Where the site is identified as having the potential to have a 'moderate' impact on archaeological features, a minor negative impact on the historic environment would be expected. A site deemed to have no impact on these assets, or where no objection has been raised, would be likely to have a negligible impact.

Heritage assets identified on Historic England's Heritage at Risk Register may be identified as being at risk for several reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

It is anticipated that MSDC will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.



### 3.4.10 SA Objective 10: Climate Change and Transport

#### Carbon Emissions

Development proposals which would be likely to increase greenhouse gas (GHG) emissions in the local area would make it more difficult for MSDC to reduce the Plan area's contribution towards the causes of climate change. This includes developments which increase housing numbers or non-residential developments which could increase GHGs within the Plan area.

The Mid Sussex District Council Sustainability Strategy 2018 - 2023 (2018) sets out the Council's approach to delivering sustainable development. The Strategy includes a Sustainability Action Plan which includes themes of energy efficiency, climate change and sustainable travel. The Strategy also sets out statutory sustainability responsibilities as set out in legislation, including the Paris Climate Change Agreement (2015), The Climate Change Act (2008) and the National Cycling and Walking Investment Strategy (2017).

#### AQMA

Exposure of new residents to air pollution has been considered in the context of the development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e., the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "beyond 200 m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant." (DfT, 2023). This statement is supported by Highways England and Natural England based on evidence presented in several research papers. A buffer distance of 200m has therefore been applied in this assessment.

#### Main Road

The proximity of a site in relation to a main road determines the exposure level of site end users to road related air and noise emissions (DMRB, 2007). In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. For the purposes of this assessment, main roads were identified using the Major Road Network dataset published by the Department for Transport (2021).

Development proposals located within 200m of a main road would be expected to have a minor negative impact on site end users' exposure to air and/ or noise pollution. Development proposals located over 200m from a main road would be expected to have a minor positive impact on site end users' exposure to air and/or noise pollution.

## Public Transport

Access to public transport via bus link has been assessed based on distance to a bus stop and its frequency, resulting in either excellent (major positive impact), good (minor positive impact), fair (negligible impact) or poor access to bus services. Travel time data provided by MSDC has been used to inform this assessment.

Development proposals located within 15 minutes (approximately 1.2km) walk from a train station are expected to have a major positive impact on access to public transport to these services. Development proposals located outside of this distance are expected to have a minor negative impact on access to public transport via train.

Additionally, development proposals located in areas with sustainable access to local facilities such as those within town centres, (e.g., superstores, high streets, and shopping centres) have been identified by MSDC as those within a 15-minute walk and are expected to have a major positive impact on access to these facilities. Development proposals located within a 30-minute journey via public transport are assessed as having a minor positive impact on access to these facilities. Proposals located outside of these thresholds would be expected to have a minor negative impact on site-end users' access to these facilities.

Similarly, development proposals located within a 15-minute walk to a convenience store would be likely to have a major positive impact on access to these facilities, and development outside this distance could have a minor negative impact on site-end users' access to the benefits of a local convenience store.

### 3.4.11 SA Objective 11: Energy and Waste

#### Household Waste

For this assessment, it is assumed that new residents in Mid Sussex will have an annual waste production of 399kg per person, in line with the England average. Between 2020 and 2021, the total waste collected by Mid Sussex Council was 52,161 tonnes (DEFRA, 2022).

A minor negative impact would be expected for development proposals which would be likely to increase household waste generation by between 0.1% and 0.99% in comparison to 2021 levels. A major negative impact would be expected for development proposals which would be likely to increase household waste generation by 1% or more in comparison to 2021 levels.

#### Energy consumption

In 2016, 34% of UK emissions came from households through heating homes and driving cars (Climate Change Committee, 2020). For this assessment, it is assumed that larger developments within the Plan area will lead to greater energy consumption and related GHG emissions. Therefore, as a means of deducing smaller developments from larger ones, residential sites proposed for 100 units or more are assessed as having a major

negative impact on energy consumption and related GHG emissions. Residential sites proposed for 10 units or more are assessed as having a minor negative impact on this receptor, and less than 10 residential units will have a negligible impact.

#### 3.4.12 SA Objective 12: Water Resources

##### Groundwater

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality.

Development proposals located within the total catchment (Zone III), outer zone (Zone II) or inner zone (Zone I) of an SPZ would be likely to have a minor negative impact on groundwater quality.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

##### Watercourses

Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage, or run-off should be permitted. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. In this assessment, a 200m buffer zone was deemed appropriate.

Development proposals located within 200m of a watercourse could potentially have a minor negative impact on water quality.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

#### 3.4.13 SA Objective 13: Economic Regeneration

New residents, in line with Council calculated sustainable distances, should be situated within 15 minutes walking distance or 30 minutes by public transport from a superstore, town centre, high street or shopping centre to ensure that they have access to a range of facilities. Travel time data provided by MSDC has been used to inform this assessment. Good sustainable access to these services and facilities will likely lead to economic

stimulation and regeneration, where an increase in footfall could positively impact the local economy and provide new job opportunities.

Development proposals located within a 15-minute walk from these areas can expect a major positive impact on this objective, and those located within a 30-minute public transport journey have been assessed as having a minor positive impact on economic regeneration. Development proposals located outside of these target distances would be expected to have a minor negative impact for this objective.

#### 3.4.14 SA Objective 14: Economic Growth

##### Employment Opportunities

It is assumed that, in line with Barton et al.'s (2010) sustainable distances, new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. These existing employment areas have been identified by MSDC.

Development proposals which would locate new residents within the target distance of a key employment area would be expected to have a minor positive impact for this objective. Development proposals which would locate new residents outside the target distance to a key employment area would be expected to have a minor negative impact for this objective.

##### Employment Floorspace

All identified RA sites are proposed for residential or mixed use. The sites proposed for mixed use are proposed for over 1,000 dwellings and propose the development of varying extents of employment land, as well as leisure centres, primary schools and GPs, for example, which may provide further local employment.

Development proposals which could result in a net increase in employment floorspace would be expected to have a major positive impact on the local economy. Development proposals which could result in a net decrease in employment floorspace would be expected to have a minor negative impact on the local economy.

#### 3.4.15 Limitations and difficulties encountered

Sustainability Appraisal is a useful exercise in identifying and balancing potential environmental and socio-economic effects against each other. However, it does not represent the entire analysis required to determine the acceptability of a plan objective or policy and even where one policy scores positively in terms of sustainability, it may not be appropriate for other reasons.

SA is a desk based exercise carried out to report the generic potential sustainability effects of implementing the plan. SA is a strategic level assessment and therefore does not contain as much detail as site specific EIA that might accompany a specific development proposal.

One factor which is not reflected in the SA scoring is the likelihood of implementation. Some of these options have much less certainty of delivery than others. The feasibility and likelihood of delivery has been looked at through other assessments, including the site assessment. SA is a useful tool used in raising awareness of potential effects to inform the content of the Plan.

It should also be noted that SA is not a quantitative exercise, meaning it is not simply a matter of how many positive or negative scores are identified through appraisal. For the purposes of presenting an overall summary score, the modal score has been presented, however individual assessments should be used to provide granular detail.

It must also be noted that the SA itself has not been used to select the strategic sites, rather it satisfies the requirements of the SEA Directive to identify the likely significant sustainability effects of implementing the plan (including sites and policies).

The site assessment process followed and the criteria applied differ from that applied by MSDC in their site assessment process since the two processes are for different purposes. The SA takes each site at face value to provide an objective score. It is not known at this stage of the plan-making process exactly what kind of development would go on each site, for instance, it is not known what site layout or design would be proposed by each of the developers for all of the reasonable alternative sites. Therefore, in the interests of consistency of assessment, additional information that some developers may be able to supply, such as masterplans, have not been taken into consideration in the SA (although may have been taken into account in the overall decision making process by the Council).

Inevitably, a degree of professional judgement has been required in undertaking the policy appraisals to determine the 'significance' of effects based on the based on baseline data available and likely evolution of the baseline.

## 4 SA Findings for the Plan Spatial Options

### 4.1 Introduction

The updated District Plan will guide the delivery of new development. Policies DP4 and DP6 of the adopted District Plan 2014-2031 set out the current spatial strategy which was based around proportionate growth across the hierarchy of settlements, with development focussed towards the three towns (Burgess Hill, East Grinstead and Haywards Heath). This spatial strategy informed the location of allocations within the adopted District Plan and subsequent Site Allocations DPD.

The revised draft strategy provides an opportunity to review this approach and, within limits of national policy, consider possible alternatives for the distribution of development. The revised draft strategy also accounts for the increase housing requirement across Mid Sussex. Further growth identified within the revised District Plan will be in accordance with the revised District Plan Strategy. The revised District Plan Strategy is based on the following four principles. Further growth within the Regulation 19 District Plan has been based on these principles:

- Protection of designated landscape (e.g., AONB).
- Making effective use of land.
- Growth at existing sustainable settlements where it is considered to be sustainable to do so.
- Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable.

A summary of the assessment scores and findings for these principles are provided in Table 4-1. The full assessment narrative is provided in this Regulation 19 SA Appendix A.

Table 4-1: Summary of the sustainability appraisal of the principles.

| SA Objective |                               | Principles                                      |                              |  |   |
|--------------|-------------------------------|---|------------------------------|--|---|
|              |                               | Protection of designated landscape (e.g., AONB) | Making effective use of land | Growth at existing sustainable settlements where it is considered sustainable to do so | Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable |
| 1            | Housing                       | +/-   | +/-                          | ++   | +/-   |
| 2            | Health & wellbeing            | +   | +                            | +/-  | +   |
| 3            | Education                     | 0   | +                            | +/-  | ++  |
| 4            | Community and crime           | 0   | +                            | +/-  | ++  |
| 5            | Flooding and surface water    | +/-   | +                            | 0  | 0   |
| 6            | Natural resources             | +   | ++                           | --   | --  |
| 7            | Biodiversity and geodiversity | ++  | +                            | -  | -   |
| 8            | Landscape                     | ++  | +                            | -  | --  |
| 9            | Cultural heritage             | +   | +/-                          | 0  | -   |
| 10           | Climate change and transport  | +   | ++                           | -  | +   |
| 11           | Energy and waste              | 0   | +/-                          | +/-  | +/-   |
| 12           | Water resources               | +/-   | +                            | +/-  | +/-   |
| 13           | Economic regeneration         | 0   | +                            | +  | ++  |
| 14           | Economic growth               | 0   | +                            | +  | ++  |

## 4.2 Reasonable alternative principles

The SEA Regulations require the Council to identify 'reasonable alternatives for all policies and proposals, where feasible'. Alternatives that are not reasonable do not need to be subject to appraisal. Alternatives to each of these principles were identified through consideration of different spatial strategy options, however, an assessment of all these alternatives was not included within the Regulation 18 SA, only the preferred two Options.

During consultation on the draft Regulation 18 District Plan, the Council received several comments surrounding the assessment of spatial Options. Consequently, further assessment of the sustainability performance of all reasonable alternatives considered has been undertaken.

Each spatial Option has then been assessed against the full suite of SA objectives to identify whether they would contribute to, or conflict with, the achievement of the sustainability objective, taking into consideration the relevant appraisal questions.

### 4.2.1 Protection of designated landscapes

There were no reasonable alternatives identified for this principle since national planning policy and guidance outlines the importance of conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONBs) and its wildlife and cultural heritage. It is therefore reasonable to conclude that a 'do nothing' scenario is not a reasonable alternative and the only principle to assess is this spatial Option: "protection of designated landscapes".

### 4.2.2 Making effective use of land

As with the first principle above, there were no reasonable alternatives identified for 'making effective use of land' since this principle requires consideration under current national planning policy. Ensuring that land within the district is used effectively is an important consideration in the preparation of the District Plan. National planning policy and guidance promotes the use of previously developed land and encourages consideration of various approaches to accommodating growth. It is therefore reasonable to conclude that a 'do nothing' scenario is also not a reasonable alternative and the only option to assess is this principle: "making effective use of land".

### 4.2.3 Assessment of Spatial Options

Alternatives were identified for the latter two principles to reflect alternative strategies for delivery of growth and meeting housing need, as outlined below:

- **Option 1:** Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.



- **Option 2:** Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.
- **Option 3:** Creating a new sustainable settlement with associated facilities.
- **Option 4:** Focus development in the three towns utilising existing facilities and transport links.
- **Option 5:** Prioritise development on brownfield land.

The sustainability performance of all five Spatial Options, as identified by MSDC, has been assessed as part of this Regulation 19 SA. Each Spatial Option has then been assessed against the full suite of SA Objectives to identify whether they would contribute to, or conflict with, the achievement of the sustainability objective, taking into consideration the relevant appraisal questions.

Options 1 and 2 were considered as part of the Regulation 18 SA. The SA conclusions made by Lepus Consulting in the Regulation 18 SA are largely considered to still be relevant. Some amendments have been made to the original assessment in light of increased understanding of the options.

Additional options were considered, as outlined above, which were not included within the Regulation 18 SA. Option 3 was considered which would entail creation of a new sustainable settlement within the district. Option 4 would focus on development primarily being within the existing three main towns (Burgess Hill, Haywards Heath and East Grinstead) since these have existing suitable facilities and transport links. Lastly Option 5 was considered which focussed on prioritising development on brownfield land.

A summary of the assessment scores and findings for these principles are provided in Table 4-2. The full assessment narrative is provided in Regulation 19 SA Appendix A. To identify the best performing option, no attempt should be made to sum the different SA 'scores' across each SA Objective since they are intrinsically different and not directly comparable. For the purposes of the summary tables presented, a modal score has been recorded.

Table 4-2: Summary of the sustainability appraisal of the Options

| SA Objective |                               | Options |     |     |     |     |
|--------------|-------------------------------|---------|-----|-----|-----|-----|
|              |                               | 1       | 2   | 3   | 4   | 5   |
| 1            | Housing                       | +/-     | ++  | +   | +/- | +/- |
| 2            | Health & wellbeing            | +       | +/- | +/- | ++  | +   |
| 3            | Education                     | ++      | +/- | +/- | ++  | ++  |
| 4            | Community and crime           | ++      | +/- | +/- | ++  | ++  |
| 5            | Flooding and surface water    | 0       | 0   | 0   | 0   | +   |
| 6            | Natural resources             | --      | --  | --  | +/- | ++  |
| 7            | Biodiversity and geodiversity | -       | -   | -   | -   | +/- |
| 8            | Landscape                     | --      | -   | -   | +   | +/- |
| 9            | Cultural heritage             | -       | 0   | 0   | +/- | +/- |
| 10           | Climate change and transport  | +       | -   | -   | +   | +   |
| 11           | Energy and waste              | +/-     | +/- | +/- | +   | +   |
| 12           | Water resources               | +/-     | +/- | +/- | +/- | +/- |
| 13           | Economic regeneration         | ++      | +   | -   | ++  | ++  |
| 14           | Economic growth               | ++      | +   | +   | ++  | ++  |

## 5 SA Findings for the Plan Policies

### 5.1 Introduction

A total of 42 policies were identified during the development of the adopted District Plan in 2014 and assessed against the previous SA framework.

Policies are split across themes (sustainability, natural environment and green infrastructure, countryside, built environment, transport, economy, sustainable communities, housing, infrastructure).

During the development of the Regulation 18 District Plan, Mid Sussex District Council undertook a review of each of the policies to determine the extent of any changes required and identified a series of alternative options to address these required changes. Policies either remained as they were, were subject to minor updates or major updates. New policies were also introduced to supplement existing policies.

The review status was as the below:

- **No update required:** the policy as written in the District Plan does not require any amendment - remains 'in date'; with full weight.
- **Minor update:** the policy as written in the District Plan is still in date however factual corrections, updates (e.g., cross-references or references to changes in policy/SPDs/guidance) or points of clarification are required. Does not change the overall meaning of the existing policy.
- **Major update:** Existing policy requires a full review as a result of changing targets, strategy, updated evidence base or national policy.

A total of 88 draft policies were assessed against the SA framework and presented in the Regulation 18 SA, 28 of these are site allocation policies which set site specific requirements to guide development.

Following consultation on the Regulation 18 Plan and SA, several updates have been made to these policies.

Table 5-1 below lists the preferred draft policies. The sustainability performance of these policies is summarised in Table 5-2, and the full assessments are included in Appendix B.

Table 5-1: Preferred draft policies.

| Policy Number         | Policy Name                             |
|-----------------------|---|
| <b>Sustainability</b> |   |
| DPS1                  | Climate change                          |
| DPS2                  | Sustainable Design and Construction     |
| DPS3                  | Renewable and Low Carbon Energy Schemes |
| DPS4                  | Flood Risk and Sustainable Drainage     |

| Policy Number                                       | Policy Name   |
|---|---|
| DPS5  | Water Neutrality                                    |
| DPS6  | Health and Wellbeing                                |
| <b>Natural Environment and Green Infrastructure</b> |   |
| DPN1  | Biodiversity, Geodiversity and Nature Recovery      |
| DPN2  | Biodiversity Net Gain                               |
| DPN3  | Green and Blue Infrastructure                       |
| DPN4  | Trees, Woodland and Hedgerows                       |
| DPN5  | Historic Parks and Gardens                          |
| DPN6  | Pollution   |
| DPN7  | Noise Impacts                                       |
| DPN8  | Light Impacts and Dark Skies                        |
| DPN9  | Air Quality   |
| DPN10   | Land Stability and Contaminated Land                |
| <b>Countryside</b>                                  |   |
| DPC1  | Protection and Enhancement of the Countryside       |
| DPC2  | Preventing Coalescence                              |
| DPC3  | New Homes in the Countryside                        |
| DPC4  | High Weald Area of Outstanding Natural Beauty       |
| DPC5  | Setting of the South Downs National Park            |
| DPC6  | Ashdown Forest SPA and SAC                          |
| <b>Built Environment</b>                            |   |
| DPB1  | Character and Design                                |
| DPB2  | Listed Buildings and Other Heritage Assets          |
| DPB3  | Conservation Areas                                  |
| DPB4  | Aerodrome Safeguarding Requirements (Air Safety)    |
| <b>Transport</b>                                    |   |
| DPT1  | Placemaking and Connectivity                        |
| DPT2  | Rights of Way and Other Recreational Routes         |
| DPT3  | Active and Sustainable Travel                       |
| DPT4  | Parking and Electric Vehicle Charing Infrastructure |
| DPT5  | Off-Airport Car Parking                             |
| <b>Economy</b>                                      |   |
| DPE1  | Sustainable Economic Development                    |
| DPE2  | Existing Employment Sites                           |
| DPE3  | Employment Allocations                              |

| Policy Number                  | Policy Name  |
|--------------------------------|--|
| DPE4                           | Town and Village Centre Development                                  |
| DPE5                           | Within Town and Village Centre Boundaries                            |
| DPE6                           | Development within Primary Shopping Areas                            |
| DPE7                           | Smaller Villages and Neighbourhood Centres                           |
| DPE8                           | Sustainable Rural Development and the Rural Economy                  |
| DPE9                           | Sustainable Tourism and the Visitor Economy                          |
| <b>Sustainable Communities</b> |  |
| DPSC GEN                       | Significant Site Requirements  |
| DPSC1                          | Land to the West of Burgess Hill/North of Hustpierpoint              |
| DPSC2                          | Land at Crabbet Park   |
| DPSC3                          | Land to the south of Reeds Lane, Sayers Common                       |
| DPSC4                          | Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common        |
| DPSC5                          | Land at Coombe Farm, London Road, Sayers Common                      |
| DPSC6                          | Land to the West of Kings Business Centre, Reeds Lane, Sayers Common |
| DPSC7                          | Land at LVS Hassocks, London Road, Sayers Common                     |
| <b>Housing</b>                 |  |
| DPH1                           | Housing  |
| DPH2                           | Sustainable Development - Outside the Built-up-Area                  |
| DPH3                           | Sustainable Development - Inside the Built-up-Area                   |
| DPH4                           | Older Persons' Housing and Specialist Accommodation                  |
| DPH5                           | Gypsies, Travellers and Travelling Showpeople                        |
| DPH6                           | Self and Custom Build Housing  |
| DPH7                           | Housing Mix  |
| DPH8                           | Affordable Housing   |
| DPH9                           | First Homes  |
| DPH10                          | Rural Exception Sites  |
| DPH11                          | Dwelling Space Standards   |
| DPH12                          | Accessibility  |
| <b>Site Allocations</b>        |  |
| DPA1                           | Batchelors Farm, Keymer Road, Burgess Hill                           |
| DPA2                           | Land at South of Appletree Close, Janes Lane, Burgess Hill           |
| DPA3                           | Burgess Hill Station, Burgess Hill                                   |
| DPA3a                          | Allotment Site - Nightingale Lane, Burgess Hill                      |
| DPA4                           | Land off West Hoathly Road, East Grinstead                           |

| Policy Number         | Policy Name   |
|-----------------------|---|
| DPA5                  | Land at Hurstwood Lane, Haywards Heath                              |
| DPA6                  | Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath |
| DPA7                  | Land east of Borde Hill Lane, Haywards Heath                        |
| DPA8                  | Orchards Shopping Centre, Haywards Heath                            |
| DPA9                  | Land to the west of Turners Hill Road, Crawley Down                 |
| DPA10                 | Hurst Farm, Turners Hill Road, Crawley Down                         |
| DPA11                 | Land rear of 2 Hurst Road, Hassocks                                 |
| DPA12                 | Land west of Kemps, Hurstpierpoint                                  |
| DPA13                 | The Paddocks, Lewes Road, Ashurst Wood                              |
| DPA14                 | Land at Foxhole Farm, Bolney  |
| DPA15                 | Ham Lane Farm House, Ham Lane, Scaynes Hill                         |
| DPA16                 | Land west of North Cottages and Challoners, Cuckfield Road, Ansty   |
| DPA17                 | Land to the west of Marwick Close, Bolney Road, Ansty               |
| DPA18                 | Land at Byanda, Hassocks  |
| DPA19                 | Land at Hyde Lodge, Handcross                                       |
| <b>Infrastructure</b> |   |
| DPI1                  | Infrastructure Provision  |
| DPI2                  | Planning Obligations  |
| DPI3                  | Major Infrastructure Projects                                       |
| DPI4                  | Communications Infrastructure                                       |
| DPI5                  | Open Space, Sport and Recreational Facilities                       |
| DPI6                  | Community and Cultural Facilities and Local Services                |
| DPI7                  | Water and Wastewater Infrastructure                                 |
| DPI8                  | Viability   |

## 5.2 Policy Assessment

A summary of the assessment scores and findings for these policies are provided in Table 5-2. The full assessment narrative is provided in Regulation 19 SA Appendix B. For the purposes of the summary tables presented, a modal score has been recorded.

Table 5-2: Sustainability performance of the draft policies as assessed in this Regulation 19 SA.

| Policy  | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|   | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|   | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| <b>Sustainability</b>                               |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPS1  | 0            | +                    | 0         | 0                   | +                        | +                 | +                           | 0         | 0                 | ++                         | +                | +               | 0                     | 0               |
| DPS2  | 0            | +                    | 0         | 0                   | +                        | +                 | +                           | 0         | 0                 | +                          | ++               | ++              | 0                     | 0               |
| DPS3  | 0            | 0                    | 0         | 0                   | 0                        | +                 | -                           | -         | 0                 | 0                          | ++               | 0               | 0                     | 0               |
| DPS4  | 0            | 0                    | 0         | 0                   | ++                       | 0                 | +                           | +         | 0                 | 0                          | 0                | +               | 0                     | 0               |
| DPS5  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | ++              | 0                     | 0               |
| DPS6  | 0            | ++                   | +         | ++                  | +                        | 0                 | +                           | +         | 0                 | +                          | 0                | 0               | +                     | +               |
| <b>Natural Environment and Green Infrastructure</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPN1  | 0            | +                    | 0         | 0                   | +                        | +                 | ++                          | +         | 0                 | +                          | 0                | +               | 0                     | 0               |
| DPN2  | 0            | +                    | 0         | 0                   | +                        | +                 | ++                          | 0         | 0                 | +                          | 0                | +               | 0                     | 0               |
| DPN3  | 0            | +                    | 0         | +                   | +                        | 0                 | +                           | +         | 0                 | +                          | 0                | +               | 0                     | 0               |
| DPN4  | -            | +                    | 0         | 0                   | +                        | +                 | ++                          | +         | +                 | +                          | 0                | +               | 0                     | 0               |
| DPN5  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |
| DPN6  | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |
| DPN7  | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |

| Policy                   | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                          | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                          | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPN8                     | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |
| DPN9                     | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| DPN10                    | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |
| <b>Countryside</b>       |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPC1                     | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |
| DPC2                     | 0            | 0                    | 0         | +                   | 0                        | +                 | 0                           | ++        | +                 | 0                          | 0                | 0               | 0                     | 0               |
| DPC3                     | +            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | +                 | 0                          | 0                | 0               | 0                     | +               |
| DPC4                     | -            | 0                    | 0         | +                   | 0                        | 0                 | +                           | ++        | +                 | 0                          | 0                | 0               | 0                     | +               |
| DPC5                     | -            | 0                    | 0         | +                   | 0                        | 0                 | +                           | ++        | +                 | 0                          | 0                | 0               | 0                     | +               |
| DPC6                     | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| <b>Built Environment</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPB1                     | 0            | +                    | 0         | ++                  | +                        | +                 | +                           | +         | +                 | +                          | +                | 0               | 0                     | +               |
| DPB2                     | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | ++                | 0                          | 0                | 0               | 0                     | 0               |
| DPB3                     | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | ++                | 0                          | 0                | 0               | 0                     | 0               |
| DPB4                     | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| <b>Transport</b>         |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |



| Policy                         | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPT1                           | 0            | ++                   | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | 0                | 0               | 0                     | +               |
| DPT2                           | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| DPT3                           | 0            | ++                   | 0         | ++                  | 0                        | 0                 | +                           | 0         | 0                 | ++                         | 0                | 0               | 0                     | +               |
| DPT4                           | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | +                | 0               | 0                     | 0               |
| DPT5                           | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| <b>Economy</b>                 |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPE1                           | 0            | 0                    | 0         | +                   | -                        | -                 | -                           | -         | -                 | 0                          | -                | -               | ++                    | ++              |
| DPE2                           | 0            | 0                    | 0         | 0                   | -                        | -                 | -                           | -         | -                 | 0                          | -                | -               | ++                    | ++              |
| DPE3                           | 0            | +                    | 0         | +                   | 0                        | -                 | -                           | -         | -                 | 0                          | -                | 0               | +                     | +               |
| DPE4                           | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | +               |
| DPE5                           | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | 0               |
| DPE6                           | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | +         | 0                 | 0                          | 0                | 0               | +                     | 0               |
| DPE7                           | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | +               |
| DPE8                           | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | 0               |
| DPE9                           | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | +                 | +                          | 0                | 0               | +                     | +               |
| <b>Sustainable Communities</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |

| Policy         | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPSCGEN        | ++           | ++                   | +         | ++                  | ++                       | +                 | ++                          | ++        | ++                | ++                         | ++               | ++              | +                     | +               |
| DPSC1          | ++           | +                    | ++        | ++                  | 0                        | -                 | 0                           | -         | 0                 | 0                          | -                | 0               | 0                     | ++              |
| DPSC2          | ++           | +                    | ++        | ++                  | 0                        | !                 | -                           | -         | -                 | 0                          | -                | 0               | +                     | ++              |
| DPSC3          | ++           | +                    | ++        | ++                  | +                        | !                 | 0                           | -         | 0                 | +                          | -                | 0               | +                     | ++              |
| DPSC4          | +            | +                    | +         | +                   | +                        | -                 | +                           | -         | 0                 | +                          | 0                | 0               | 0                     | +               |
| DPSC5          | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | +                          | 0                | 0               | 0                     | +               |
| DPSC6          | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | +                          | -                | 0               | 0                     | +               |
| DPSC7          | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | 0                          | -                | 0               | 0                     | +               |
| <b>Housing</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPH1           | +            | +/-                  | 0         | +/-                 | -                        | !                 | +/-                         | -         | -                 | -                          | -                | 0               | 0                     | 0               |
| DPH2           | +            | 0                    | 0         | +                   | 0                        | -                 | 0                           | +         | 0                 | 0                          | 0                | 0               | +                     | +               |
| DPH3           | +            | 0                    | 0         | +                   | 0                        | +                 | 0                           | +         | 0                 | +                          | 0                | 0               | +                     | +               |
| DPH4           | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| DPH5           | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPH6           | +            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPH7           | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

| Policy                  | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|-------------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                         | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                         | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPH8                    | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPH9                    | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPH10                   | +            | 0                    | +         | 0                   | 0                        | -                 | 0                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| DPH11                   | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPH12                   | +            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| <b>Site Allocations</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPA1                    | +            | +                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA2                    | ++           | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA3                    | ++           | ++                   | ++        | ++                  | +                        | +                 | 0                           | +         | 0                 | ++                         | -                | 0               | ++                    | +               |
| DPA3a                   | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| DPA4                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA5                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA6                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | +               |
| DPA7                    | +            | +                    | +         | +                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | +               |
| DPA8                    | ++           | ++                   | ++        | ++                  | +                        | +                 | 0                           | +         | 0                 | ++                         | -                | 0               | ++                    | +               |
| DPA9                    | ++           | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | -                | 0               | 0                     | +               |

| Policy                | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|-----------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                       | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                       | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPA10                 | +            | +                    | +         | 0                   | +                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA11                 | +            | 0                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | ++                         | 0                | 0               | ++                    | +               |
| DPA12                 | +            | +                    | +         | ++                  | +                        | -                 | 0                           | -         | -                 | ++                         | 0                | 0               | ++                    | +               |
| DPA13                 | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | -                     | +               |
| DPA14                 | ++           | 0                    | -         | +                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | 0                     | +               |
| DPA15                 | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA16                 | +            | 0                    | 0         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA17                 | +            | 0                    | 0         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPA18                 | +            | 0                    | 0         | ++                  | +                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | ++                    | ++              |
| DPA19                 | +            | +                    | 0         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | +/-              | 0               | 0                     | ++              |
| <b>Infrastructure</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| DPI1                  | 0            | +                    | +         | +                   | +                        | 0                 | 0                           | 0         | 0                 | +                          | +                | +               | +                     | +               |
| DPI2                  | 0            | +                    | +         | +                   | +                        | 0                 | ++                          | +         | 0                 | +                          | +                | 0               | 0                     | +               |
| DPI3                  | 0            | +                    | +         | 0                   | +                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | +                     | +               |
| DPI4                  | 0            | 0                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | +               |
| DPI5                  | 0            | +                    | 0         | +                   | 0                        | 0                 | +                           | +         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

| Policy | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|        | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|        | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPI6   | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| DPI7   | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | ++              | 0                     | 0               |
| DPI8   | +/-          | +/-                  | +/-       | +/-                 | 0                        | 0                 | 0                           | 0         | 0                 | +/-                        | +/-              | +/-             | +/-                   | +/-             |

## 6 Site Assessments Pre-Mitigation

### 6.1 Introduction

To inform the Regulation 18 Plan development and Sustainability Appraisal (SA), Mid Sussex District Council undertook a Strategic Housing and Economic Land Availability Assessment (SHELAA) and Site Selection Process to identify potential suitable sites for allocation within the District Plan to meet housing needs. This process involved assessing all potential sites against fourteen assessment criteria set out within a Site Selection Methodology paper, covering a range of topics including national policy requirements and national and local designations, to determine their suitability for allocation.

Following assessment against the Site Selection methodology, 42 reasonable alternative sites for housing, and two reasonable alternative sites for C2 use were identified. All of these reasonable alternative sites are outlined in Table 6-1 below.

### 6.2 Changes following Regulation 18 Consultation

The Regulation 18 SA, prepared by Lepus Consulting in 2022, presented an appraisal of these reasonable alternative sites for residential development and C2 use identified by Mid Sussex District Council, in accordance with the SA framework and methodology.

During consultation on the draft Regulation 18 District Plan, the Council received several comments from members of the public and consultees on the results of the SHELAA, Site Selection Process and supporting SA. Some of these comments related to questions over the scoring of particular sites and consistency of scoring between sites. These comments and questions have been reviewed by JBA Consulting, and amendments have been made to scoring assigned where it is deemed within the remit of the SA and in accordance with the topic specific methodologies and assumptions outlined in section 3.4 above. Where comments relate to scores based off travel time data provided by MSDC, or methodologies and assumptions outlined by Lepus Consulting, scores remain as per the Regulation 18 SA. It should also be reiterated that the SA is an objective assessment based on sites at face value and has not taken into consideration specific details of proposed developments, such as proposed layout and masterplans, as these are not available for all sites at the time of writing.

For completeness, the full site assessment undertaken by Lepus Consulting during Regulation 18 is presented in Appendix E. Where proposed changes following consultation have been deemed legitimate, these changes have been made by JBA Consulting through use of tracked changes.

Following review of comments on the SHELAA and the Site Selection Process, the Council reviewed the site assessment scores assigned against the Site Selection Methodology and

updated scores for 14 of the 42 reasonable alternative sites, where appropriate, to address concerns over inconsistency of assessment across all reasonable alternative sites. These changes and the updated assessment findings are presented in Appendix C. In addition, since the publication of the Regulation 18 Plan, eight new reasonable alternative sites have been identified. All of these sites and their respective status are outlined in Table 6- and shown on Figure 6-1 below.

This SA site assessment therefore presents an updated assessment of 14 reasonable alternative sites against the SA framework where updates have been made to the Site Selection conclusions following receipt of consultee comments, along with an assessment of the eight new reasonable alternative sites that have been identified. Where existing reasonable alternative sites have been assessed against the SA Framework at Regulation 18, and remain unchanged from the consultation process, no further assessment has been undertaken, these are presented within Appendix E.

### 6.3 Reasonable alternative sites

The reasonable alternative sites considered in this assessment are listed in Table 6-1 below, along with their location and potential yield.

Table 6-1: Reasonable alternative sites

| SHELAA Ref | Site  | Settlement     | Yield |
|------------|---|----------------|-------|
| 13         | Land west of Kemps, Hurstpierpoint                                  | Hurstpierpoint | 90    |
| 18         | Crabbet Park, Old Hollow, Near Crawley                              | Copthorne      | 2,300 |
| 19         | Land east of College Lane, Hurstpierpoint                           | Hurstpierpoint | 80    |
| 198        | Land off West Hoathly Road, East Grinstead                          | East Grinstead | 45    |
| 210        | Land rear of 2 Hurst Road (Land opposite Stanford Avenue) Hassocks  | Hassocks       | 25    |
| 503        | Haywards Heath Golf Course, High Beech Lane, Haywards Heath         | Lindfield      | 700   |
| 508        | Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath | Haywards Heath | 30    |
| 526        | Land east of Paynesfield, Bolney                                    | Bolney         | 30    |
| 543        | Land West of London Road (north), Bolney                            | Bolney         | 65    |
| 556        | Land east of Borde Hill Lane, Haywards Heath                        | Haywards Heath | 60    |
| 573        | Batchelors Farm, Keymer Road, Burgess Hill                          | Burgess Hill   | 33    |
| 575        | Land north east of Hurstpierpoint                                   | Hurstpierpoint | 150   |

| SHELAA Ref | Site   | Settlement     | Yield         |
|------------|--|----------------|---------------|
| 601        | Land at Coombe Farm, London Road, Sayers Common                        | Sayers Common  | 210           |
| 617        | Land at Foxhole Farm, Bolney   | Bolney         | 100           |
| 631        | Challoners, Cuckfield Road, Ansty                                      | Ansty          | 21            |
| 678        | Broad location West of A23   | Twineham       | 900           |
| 686        | Land to the rear of The Martins (south of Hophurst Lane), Crawley Down | Crawley Down   | 125           |
| 688        | Land to west of Turners Hill Road, Crawley Down                        | Crawley Down   | 350           |
| 736        | Land at Ansty Farm, Cuckfield Road, Ansty                              | Ansty          | 1,400 - 1,600 |
| 740        | Broad location to the West of Burgess Hill                             | Burgess Hill   | 1,350         |
| 743        | Hurst Farm, Turners Hill Road, Crawley Down                            | Crawley Down   | 37            |
| 784        | Extension to allocated Land at Bolney Road, Ansty                      | Ansty          | 45            |
| 789        | Phase 1 Swallows Yard, London Road, Albourne                           | Albourne       | 46            |
| 799        | Land south of Reeds Lane, Sayers Common                                | Sayers Common  | 2,000         |
| 830        | Land to the west of Kings Business Centre, Reeds Lane, Sayers Common   | Sayers Common  | 100           |
| 844        | Land at Noth Colwell Farm, Lewes Road, Haywards Heath                  | Haywards Heath | 100           |
| 858        | Land at Hurstwood Lane, Haywards Heath                                 | Haywards Heath | 36            |
| 984        | The Paddocks Lewes Road, Ashurst Wood                                  | Ashurst Wood   | 8             |
| 986        | Land to the West of Albourne Primary School Henfield Road, Albourne    | Albourne       | 125           |
| 1003       | Land to South LVS Hassocks, London Road, Sayers Common                 | Sayers Common  | 200           |
| 1018       | Extension south west of Meadow View, Sayers Common                     | Sayers Common  | 250           |
| 1020       | Ham Lane Farm House, Ham Lane Scaynes Hill                             | Scaynes Hill   | 30            |



| SHELAA Ref                              | Site  | Settlement     | Yield |
|---|---|----------------|-------|
| 1022                                    | Former Hassocks Golf Club, London Road, Hassocks                          | Hassocks       | 500   |
| 1026                                    | Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common             | Sayers Common  | 33    |
| 1030                                    | Land at South of Appletree Close, Janes Lane, Burgess Hill                | Burgess Hill   | 25    |
| 1063                                    | Phase 2 Swallows Yard, London Road Albourne                               | Albourne       | 46    |
| 1075                                    | Land north of Willow way and Talbort Mead, Cuckfield Road, Hurstpierpoint | Hurstpierpoint | 153   |
| 1095                                    | Land at West Town Farm Hurstpierpoint                                     | Hurstpierpoint | 500   |
| 1101                                    | Land at Byanda, Hassocks  | Hassocks       | C2    |
| 1105                                    | Land east and west of Malthouse Lane                                      | Burgess Hill   | 750   |
| 1106                                    | Land at Hyde Lodge, Handcross   | Handcross      | C2    |
| 1120                                    | Land east of Foxhole Lane   | Bolney         | 200   |
| 1121                                    | Orchards Shopping Centre  | Haywards Heath | 100   |
| 1123                                    | Burgess Hill Station  | Burgess Hill   | 300   |
| <b>New reasonable alternative sites</b> |   |                |       |
| 1146                                    | Swallows Yard (Phases 1&2)  | Hassocks       | 90    |
| 1135                                    | Land r/o Challoners, Cuckfield Road                                       | Ansty          | 9     |
| 1141                                    | Land west of Cuckfield Road   | Ansty          | 6     |
| 1148                                    | Land west of North Cottages and Challoners                                |                | 30    |
| 1133                                    | Land west of Bolney Place   | Bolney         | 10    |
| 1137                                    | Land to the west of Ockley Lane   | Hassocks       | 400   |
| 1122                                    | Sussex House and Commercial House and 54 and 56 Perrymount Road           | Haywards Heath | 100   |
| 29                                      | Land off Snowdrop Lane  | Lindfield      | 40    |

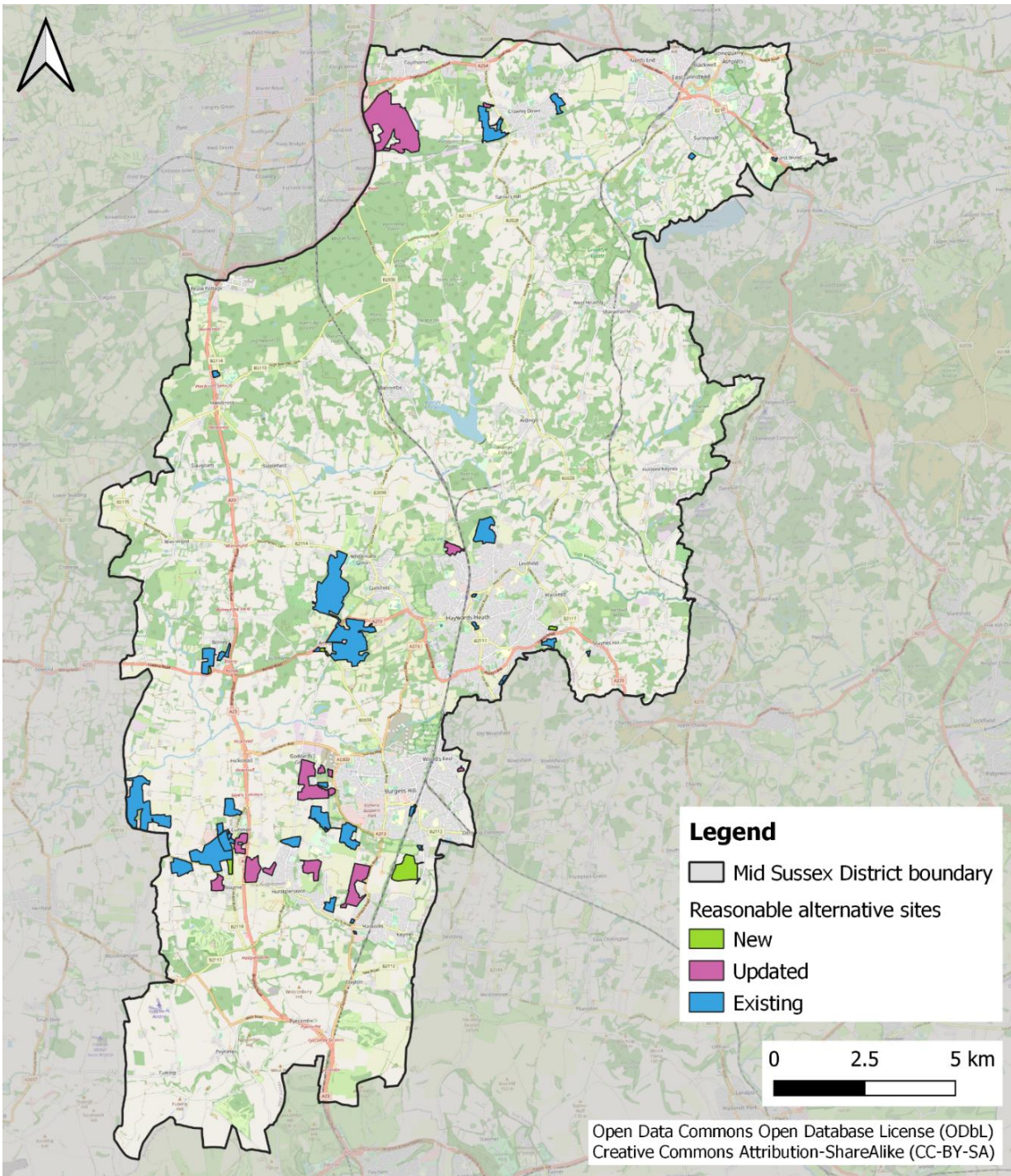


Figure 6-1: Map showing the existing sites, those with updated assessment results and new sites brought forward.

#### 6.4 Site assessment pre-mitigation

Table 6-2 below provides a summary of the assessment of reasonable alternative sites, including re-assessed sites and new sites, against the SA framework. For the purposes of the summary tables presented, a modal score has been recorded.

Table 6-2: Pre-mitigation impact matrix for all reasonable alternative sites

| Site Reference  | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|   | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|   | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| Additional reasonable sites assessed at Regulation 19 |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1146  | +            | 0                    | +         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | 0                | 0               | -                     | 0               |
| 1135  | +            | 0                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | 0                | 0               | -                     | 0               |
| 1141  | +            | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | -                     | 0               |
| 1148  | +            | 0                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | 0                | 0               | -                     | 0               |
| 1133  | +            | -                    | -         | 0                   | -                        | -                 | 0                           | 0         | -                 | -                          | 0                | 0               | -                     | 0               |
| 1137  | ++           | +                    | -         | 0                   | -                        | -                 | 0                           | -         | 0                 | 0                          | -                | -               | 0                     | 0               |
| 1122  | ++           | +                    | +         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | -                | 0               | +                     | 0               |
| 29  | +            | +                    | +         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | 0                | 0               | -                     | 0               |
| Sites assessed at Regulation 18                       |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 13  | +            | +                    | -         | 0                   | -                        | -                 | 0                           | -         | 0                 | +                          | -                | 0               | +                     | 0               |
| 18  | ++           | -                    | -         | -                   | --                       | --                | 0                           | -         | 0                 | -                          | --               | -               | -                     | +               |
| 19  | +            | -                    | -         | 0                   | --                       | -                 | 0                           | -         | -                 | -                          | -                | 0               | -                     | 0               |
| 198   | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | -               | -                     | 0               |
| 210   | +            | -                    | +         | 0                   | +                        | -                 | 0                           | 0         | 0                 | ++                         | -                | 0               | +                     | 0               |
| 503   | ++           | +                    | -         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | -               |
| 508   | +            | +                    | -         | 0                   | -                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 526   | +            | -                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 543   | +            | -                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 556   | +            | +                    | -         | 0                   | --                       | -                 | 0                           | 0         | 0                 | +                          | -                | -               | -                     | 0               |
| 573   | +            | +                    | +         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |

| Site Reference | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 575            | ++           | -                    | -         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | 0               |
| 601            | ++           | -                    | -         | -                   | --                       | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 617            | ++           | -                    | -         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 631            | +            | -                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 678            | ++           | -                    | -         | -                   | --                       | -                 | 0                           | 0         | 0                 | -                          | --               | -               | -                     | 0               |
| 686            | ++           | +                    | 0         | 0                   | --                       | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 688            | ++           | -                    | 0         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | 0               |
| 736            | ++           | -                    | -         | -                   | --                       | -                 | 0                           | 0         | -                 | -                          | --               | -               | -                     | +               |
| 740            | ++           | -                    | 0         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | +               |
| 743            | +            | +                    | +         | -                   | --                       | 0                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | -               |
| 784            | +            | -                    | -         | -                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 789            | +            | +                    | -         | -                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 799            | ++           | -                    | -         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | 0               | -                     | +               |
| 830            | ++           | +                    | -         | -                   | --                       | -                 | 0                           | 0         | 0                 | -                          | --               | -               | -                     | 0               |
| 844            | ++           | -                    | 0         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 858            | +            | +                    | -         | -                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 984            | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | 0                | 0               | -                     | 0               |
| 986            | ++           | +                    | -         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | 0               | -                     | 0               |
| 1003           | ++           | +                    | -         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | 0               |
| 1018           | ++           | -                    | 0         | -                   | --                       | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 1020           | +            | +                    | -         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |

| Site Reference | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1022           | ++           | -                    | -         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | -               |
| 1026           | +            | +                    | 0         | 0                   | --                       | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 1030           | +            | +                    | 0         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | -               | -                     | 0               |
| 1063           | +            | -                    | -         | -                   | +                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | -                     | 0               |
| 1075           | ++           | +                    | -         | 0                   | --                       | -                 | 0                           | 0         | 0                 | +                          | --               | -               | -                     | 0               |
| 1095           | ++           | -                    | 0         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | 0               |
| 1101           | +            | -                    | 0         | 0                   | --                       | -                 | 0                           | 0         | 0                 | ++                         | +/-              | 0               | +                     | 0               |
| 1105           | ++           | -                    | +         | -                   | --                       | -                 | 0                           | -         | 0                 | -                          | --               | -               | -                     | 0               |
| 1106           | +            | -                    | 0         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | +/-              | 0               | -                     | 0               |
| 1120           | ++           | -                    | -         | -                   | -                        | -                 | 0                           | 0         | 0                 | -                          | --               | 0               | -                     | 0               |
| 1121           | ++           | +                    | -         | 0                   | -                        | +                 | 0                           | 0         | 0                 | ++                         | --               | 0               | +                     | -               |
| 1123           | ++           | +                    | +         | 0                   | -                        | 0                 | 0                           | 0         | 0                 | ++                         | --               | 0               | +                     | -               |

## 7 Site Assessments Post-mitigation

### 7.1 Cumulative Effects

A summary of the predicted cumulative effects of the proposed policies in relation to each of the SA objectives is detailed in Appendix D.

### 7.2 Post-mitigation site assessments

The impact matrices for the post-mitigation assessment of all reasonable alternative sites, taking into consideration mitigations through application of plan policies, is presented in Table 7-1. For the purposes of the summary tables presented, a modal score has been recorded, further detail of the assessment and the mitigation measures considered is detailed in Appendix D.

Table 7-1: Impact matrix of the post-mitigation assessment of reasonable alternative sites and sites assessed at Regulation 18 stage.

| Site Reference  | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|   | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|   | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| Additional reasonable sites assessed at Regulation 19 |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1146  | +            | +                    | +         | 0                   | +                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | -                     | +               |
| 1135  | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | -                     | +               |
| 1141  | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | -                     | +               |
| 1148  | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | -                     | +               |
| 1133  | +            | 0                    | -         | 0                   | 0                        | -                 | 0                           | 0         | -                 | 0                          | 0                | 0               | -                     | +               |
| 1137  | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | -         | 0                 | +                          | +/-              | 0               | 0                     | +               |
| 1122  | ++           | +                    | +         | 0                   | +                        | -                 | 0                           | 0         | 0                 | ++                         | +/-              | 0               | +                     | +               |
| 29  | +            | +                    | +         | 0                   | +                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | -                     | +               |
| Sites assessed at Regulation 18                       |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |

| Site Reference | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 13             | +            | +                    | +         | ++                  | +                        | -                 | 0                           | -         | -                 | ++                         | 0                | 0               | ++                    | +               |
| 18             | ++           | +                    | ++        | ++                  | 0                        | -                 | -                           | -         | -                 | 0                          | -                | 0               | +                     | ++              |
| 19             | +            | +                    | -         | 0                   | 0                        | -                 | 0                           | -         | -                 | -                          | 0                | 0               | -                     | +               |
| 198            | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 210            | +            | 0                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | ++                         | 0                | 0               | ++                    | +               |
| 503            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | -                     | 0               |
| 508            | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | +               |
| 526            | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | -                     | +               |
| 543            | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | -                          | +/-              | 0               | -                     | +               |
| 556            | +            | +                    | +         | +                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | +               |
| 573            | +            | +                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 575            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | -         | 0                 | 0                          | +/-              | 0               | -                     | +               |
| 601            | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | +                          | 0                | 0               | 0                     | +               |
| 617            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | -                     | +               |
| 631            | +            | 0                    | 0         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 678            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | -                     | +               |
| 686            | ++           | +                    | 0         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 688            | ++           | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | -                | 0               | 0                     | +               |
| 736            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | -                 | -                          | +/-              | 0               | -                     | +               |
| 740            | ++           | +                    | ++        | ++                  | 0                        | -                 | 0                           | -         | 0                 | 0                          | -                | 0               | 0                     | ++              |
| 743            | +            | +                    | +         | 0                   | +                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |

| Site Reference | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 784            | +            | 0                    | 0         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 789            | +            | +                    | -         | 0                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | -                     | +               |
| 799            | ++           | +                    | ++        | ++                  | +                        | -                 | 0                           | -         | 0                 | +                          | -                | 0               | +                     | ++              |
| 830            | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | +                          | -                | 0               | 0                     | +               |
| 844            | ++           | +                    | 0         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | +/-              | 0               | -                     | +               |
| 858            | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 984            | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | -                     | +               |
| 986            | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | -         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1003           | ++           | +                    | +         | +                   | +                        | -                 | +                           | +         | 0                 | 0                          | -                | 0               | 0                     | +               |
| 1018           | ++           | +                    | 0         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1020           | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 1022           | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | -         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1026           | +            | +                    | +         | +                   | +                        | -                 | +                           | 0         | 0                 | +                          | 0                | 0               | 0                     | +               |
| 1030           | ++           | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |
| 1063           | +            | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1075           | ++           | +                    | -         | 0                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1095           | ++           | +                    | 0         | 0                   | 0                        | -                 | 0                           | -         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1101           | +            | 0                    | 0         | ++                  | +                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | ++                    | ++              |
| 1105           | ++           | +                    | +         | 0                   | 0                        | -                 | 0                           | -         | 0                 | +                          | +/-              | 0               | -                     | +               |
| 1106           | +            | +                    | 0         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | +/-              | 0               | 0                     | ++              |
| 1120           | ++           | 0                    | -         | +                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | 0                     | +               |



| Site Reference | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1121           | ++           | ++                   | ++        | ++                  | +                        | +                 | 0                           | +         | 0                 | ++                         | -                | 0               | ++                    | +               |
| 1123           | ++           | ++                   | ++        | ++                  | +                        | +                 | 0                           | +         | 0                 | ++                         | -                | 0               | ++                    | +               |

# 8 Monitoring and Next Steps

## 8.1 Monitoring and the predicted significant impact of the Plan

The significant sustainability effects of implementing a DPR must be monitored to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The SA Framework contained in this report includes suggested indicators to monitor each of the sustainability objectives. These are shown in Table 8-1 below; however, these may not all be collected due to resource limitation and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the SA Framework, but that monitoring should focus on significant sustainability effects.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

| SA Receptor                               | SA Objective  | Monitoring Indicators   |
|---|---|---|
| Human Health; Population; Material Assets | 1 <b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford. | Housing completions (net).<br>Affordable housing completions (gross).<br>Affordable housing contributions received.<br>Number of households on the housing needs register.<br>Number of households accepted as full homeless.<br>House price to earnings ratio.<br>Net additional Gypsy and Traveller pitches.<br>Number of C2 provision. |

| SA Receptor   | SA Objective  | Monitoring Indicators  |
|---|---|--|
| Biodiversity;<br>Flora; Fauna;<br>Human<br>Health;<br>Population;<br>Material<br>Assets | 2<br><b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.  | Number of applications resulting in new, extended or improved health Facilities.<br>Number of households within a 15-minute walk (approx. 1.2km) from GP surgery / health centre / hospital.<br>Number of households within 300m of leisure and open space facilities (as defined in the Open Space study).<br>Hectares of accessible open space per 1,000 population.<br>Financial contributions towards leisure facilities received.<br>Financial contributions towards health received.<br>Number of additional community facilities delivered.<br>Percentage of population not in good health. |
| Human<br>Health;<br>Population;<br>Material<br>Assets                                   | 3<br><b>Education:</b> 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  | Percentage of population of working age qualified to at least NVQ level 3 (or equivalent).<br>Percentage of adults with poor literacy and numeracy skills.<br>Number of households within a 15-minute walk (approx. 1.2km) from a Primary School.  |
| Human<br>Health;<br>Population;<br>Material<br>Assets                                   | 4<br><b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities. | All crime – number of crimes per 1000 residents per annum.<br>Number of domestic burglaries per 1,000 households.<br>Number of dwellings permitted more than 150m from a built-up area boundary.<br>Number of households within a 15-minute walk (approx. 1.2km) from community facilities (e.g., community hall, place of worship, library).<br>Number of applications resulting in a loss of community facilities (e.g., shop, pub, place of worship, etc.).   |
| Climatic<br>Factors;  | 5<br><b>Flooding and surface water:</b> To  | Percentage of the District that is within Flood Zone 2/Flood Zone 3.   |

| SA Receptor  |   | SA Objective   | Monitoring Indicators  |
|--|---|--|--|
| Human health;<br>Biodiversity;<br>Flora; Fauna;<br>Material<br>Assets; Water |   | reduce the risk to people, properties, the economy and the environment of flooding from all sources  | <p>Number of properties at risk from flooding, as defined by the Environment Agency.</p> <p>Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds.</p> <p>Number of developments with sustainable drainage systems.</p>   |
| Soil; Material<br>Assets   | 6 | <p><b>Natural resources:</b><br/>To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p> | <p>Percentage of new and converted homes developed on brownfield land.</p> <p>Percentage of new employment floorspace on previously developed land.</p> <p>Average density of new housing developments.</p> <p>Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development.</p> <p>Number of empty homes.</p>   |
| Biodiversity;<br>Flora; Fauna  | 7 | <p><b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity</p>  | <p>Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District.</p> <p>Area of ancient woodland within the District.</p> <p>Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC &amp; Ramsar).</p> <p>Number of planning applications approved contrary to advice given by Natural England on biodiversity issues.</p> <p>Number of dwellings permitted within the 7km Zone of Influence (SPA).</p> <p>Capacity of Suitable Accessible Natural Greenspace (SANG).</p> <p>Net gain in biodiversity.</p> |

| SA Receptor  | SA Objective | Monitoring Indicators   |
|--|--------------|---|
| Landscape;<br>Cultural Heritage;<br>Architectural and<br>Archaeological Heritage | 8            | <p><b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place</p> |
| Cultural Heritage;<br>Architectural and<br>Archaeological Heritage               | 9            | <p><b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>  |

| SA Receptor   | SA Objective | Monitoring Indicators  |
|---|--------------|--|
| Material Assets;<br>Climatic Factors;<br>Landscape;<br>Population;<br>Human Health; Air;<br>Fauna | 10           | <p><b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p> <p>Car ownership.</p> <p>Number of households within a 5-minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour).</p> <p>Number of households within a 10-minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)</p> <p>Number of households within a 15-minute walk (approx. 1.2km) of a train Station.</p> <p>Proportion of journeys to work other than by car.</p> <p>Percentage of residents living and working within Mid Sussex.</p> <p>Monetary investment in sustainable transport schemes (value of s.106 agreements).</p> <p>Number of Air Quality Management Areas (AQMAs) within the District.</p> <p>Change in CO2 emissions from transport.</p> <p>Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore / town centre / high street shopping facilities).</p> <p>Number of households within 30min by public transport, or 15min by walking or cycling journey time from a convenience store.</p> |
| Climatic Factors;<br>Material Assets  | 11           | <p><b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.</p> <p>Domestic energy consumption per household.</p> <p>Number of renewable energy installations within Mid Sussex.</p> <p>Installed capacity of renewable energy installations within Mid Sussex.</p> <p>Domestic waste produced per head of population.</p> <p>Percentage of domestic waste that has been recycled.</p>   |

| SA Receptor  | SA Objective |  | Monitoring Indicators   |
|--|--------------|--|---|
| Water;<br>Biodiversity;<br>Flora; Fauna;<br>Material<br>Assets | 12           | <p><b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.</p>                           | <p>Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate".</p> <p>Stretches of watercourse with no deterioration in Water Framework Directive status.</p> <p>Incidents of major and significant water pollution within the District.</p> <p>Number of planning applications approved contrary to advice given by the EA on water quality issues.</p> <p>Number of developments that minimise water consumption.</p>   |
| Population;<br>Material<br>Assets                              | 13           | <p><b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.</p> | <p>Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2).</p> <p>Number of households within a 15-minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities).</p> <p>Retail unit vacancy rate.</p> <p>Total amount of new commercial / business floorspace in rural areas.</p> <p>Number of vacant sites brought back into use in Town Centres.</p> <p>Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore / town centre / high street shopping facilities).</p> |

| SA Receptor                               | SA Objective  | Monitoring Indicators  |
|---|---|--|
| Human Health; Population; Material Assets | 14 <b>Economic growth:</b><br>To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities. | Net increase/decrease in commercial (Use Classes E, B2, B8) and office € floorspace.<br>Number of businesses within the District.<br>Number of new businesses setting up in the District.<br>Percentage of Mid Sussex residents who are employed.<br>Percentage of Mid Sussex residents who are economically active.<br>Average weekly income (gross) for those who are employed in the District.<br>Percentage of residents living and working within Mid Sussex.<br>Job density (ratio of jobs to working age population). |

## 8.2 Consultation

A key aspect of the SA process is consultation. The SA process provides a mechanism to ensure that stakeholder engagement requirements are achieved by providing interested parties/organisations and the public an opportunity to inform the process and comment on decisions taken. Stakeholder engagement also ensures that economic, environmental, and social issues, constraints, and opportunities are identified and assessed throughout the development of the DPR.

This Sustainability Appraisal Report will form part of the public consultation on the Publication Draft DPR. It will be sent to the statutory consultation bodies (Natural England, Historic England and the Environment Agency) and will be available for view on Mid Sussex District Council's website alongside the Publication Draft Plan.

## 8.3 Next steps

The Sustainability Appraisal Report will now be published for public and stakeholder consultation alongside the Draft Plan. The Draft Plan and SA Report will then be submitted for independent examination.



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# A Appraisal of Spatial Options in the Mid Sussex District Plan Review 2021 - 2039

## A.1 Introduction

As outlined in Section 4, an assessment of the spatial options for the distribution of development and their reasonable alternatives has been undertaken. A summary of these alternatives and the assessment findings was included in Section 4, with the full assessment presented below.

## A.2 Principles

### A.2.1 Protection of designated landscapes

The National Planning Policy Framework (NPPF) states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes*". The High Weald Area of Outstanding Natural Beauty (AONB) covers the north of the district, and so when developing spatial Options for the Plan period, this principle was included to ensure that the spatial options do not result in development that would bring harm to the landscape character or setting of the AONB.

There were no reasonable alternatives identified for 'protection of designated landscapes' as this principle requires consideration under current national planning policy. Under the SEA Regulations, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the NPPF).

National planning policy and guidance outlines the importance of conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONBs) and its wildlife and cultural heritage. It is therefore reasonable to conclude that a 'do nothing' scenario is not a reasonable alternative and the only principle to assess is this spatial Option: "protection of designated landscapes".

A summary of the assessment scores is provided in Table A-1 below.

Table A-1: Assessment of the potential impacts of the principle: protection of designated landscapes.

| Protection of Designated Landscapes | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|-------------------------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                                     | +/-          | +                    | 0         | 0                   | +/-                      | +                 | ++                          | ++        | +                 | +                          | 0                | +/-             | 0                     | 0               |

It is uncertain the impact this principle would have on housing delivery. The impact could be negative under the assumption that housing developments would either not be allowed in the High Weald AONB or the size of the development would be limited to ensure that significant damage to the landscape character does not occur. However, the Strategic Housing and Employment Land Availability Assessment (SHELAA) and Site Selection process found that there is limited further growth potential at settlements within the AONB, and that the potential for growth is mostly in settlements out with the AONB.

However, this principle performs well against the natural resources objective, as it will help drive redevelopment of previously developed land and minimise the loss of open countryside to development.

It is also considered that this principle would have a minor positive impact on health and wellbeing, and climate change and transport as it would encourage development in the main towns outside the AONB ensuring residents have access to services and reduce the need for private car use, and its associated CO2 emissions.

This principle would have a major positive impact on biodiversity and geodiversity, and landscape objectives. Namely as it would protect landscape character and conserve the High Weald AONB, which also includes nationally designated land, such as Worth Forest SSSI and Wakehurst and Chiddingly Woods SSSI. Historic assets can be considered part of the landscape character, and so protection of the High Weald AONB, which contains many Listed Buildings and Scheduled Monuments, would have a major positive impact on the cultural heritage objective.

It is unclear on the impact this principle would have on the flooding and surface water objective or the water resources' objective. It may have a positive impact as protection of the landscape could help achieve Water Framework Directive Objectives; however, driving

development to existing areas may put pressure on water resources here and increase the number of properties at risk of flooding. Although if natural flood management and sustainable design and construction techniques are implemented, then the risk of flooding could be reduced.

It is considered that this principle would have a neutral impact on the other SA objectives. For example, this principle would not impact economic growth or regeneration, the approach to education and community and crime, or energy and waste consumption.

#### A.2.2 Making effective use of land

This principle is given a comprehensive definition in the NPPF which states that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land"*. This principle was therefore included to ensure development over the plan period is considering the redevelopment of previously developed land where possible while meeting housing needs and achieving healthy communities, without causing unnecessary harm to the environment.

As with the first principle above, there were no reasonable alternatives identified for 'making effective use of land' since this principle requires consideration under current national planning policy. Ensuring that land within the district is used effectively is an important consideration in the preparation of the District Plan. National planning policy and guidance promotes the use of previously developed land and encourages consideration of various approaches to accommodating growth. It is therefore reasonable to conclude that a 'do nothing' scenario is also not a reasonable alternative and the only option to assess is this principle: "making effective use of land".

A summary of the assessment scores is provided in Table A-2 below.

Table A-2: Summary of assessments of potential impacts of the principle: making effective use of land.

| Making Effective Use of Land | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|------------------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                              | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                              | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                              | +/-          | +                    | +         | +                   | +                        | ++                | +                           | +         | +/-               | ++                         | +/-              | +               | +                     | +               |

This principle would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. By bringing sites back to their full potential, it increases the vibrancy of a street making an area more attractive to live and work, and restores the character of the town without compromising the wider landscape character of the district. Through promoting development in existing settlements, new residents are more likely to have access to healthcare, schools, and community facilities, as well as public transport which in turn will reduce private car use, and the associated carbon emissions. This promotes town centre regeneration and supports the economic viability of existing businesses here and will reduce the need to commute out of the area.

The NPPF considers that making effective use of land is also looking at the potential for undeveloped land to provide "*wildlife, recreation, flood risk mitigation, cooling / shading, carbon storage or food production*". Therefore, this principle gives weight to achieving positive impacts for climate change, biodiversity, and flooding and surface water objectives. Nonetheless, without knowing the full details of the developments, it is difficult to conclude that this principle would not cause harm to local cultural heritage assets.

Furthermore, there is uncertainty on whether this principle would meet the housing needs of the district as it promotes the redevelopment of previously developed land which limits the provision of housing and the ability to deliver the range of type, tenure and mix of homes that the district requires. Mid Sussex has limited brownfield sites available for development - noting that only 12% of the district is within a defined Built-up Area.

### A.2.3 Growth strategies

Alternatives were identified for the second two pillars to reflect alternative strategies for delivery of growth and meeting housing need.

The Options considered are outlined in Table A-3 below

Table A-3: Alternative spatial options for growth considered.

| Option   | Description of Spatial Option   |
|----------|---|
| Option 1 | Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.   |
| Option 2 | Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities. |
| Option 3 | Creating a new sustainable settlement with associated facilities.   |
| Option 4 | Focus development in the three towns utilising existing facilities and transport links.   |
| Option 5 | Prioritise development on brownfield land.  |

Options 1 and 2 were considered as part of the Regulation 18 SA. The SA conclusions made by Lepus are largely considered to still be relevant. Some amendments have been made to the original assessment in light of increased understanding of the options.

Additional options were considered as a result of responses received during the Regulation 18 consultation, as outlined above, which were not included within the Regulation 18 SA. Option 3 was considered which would entail creation of a new sustainable settlement within the district. Option 4 would focus on development primarily being within the exiting three main towns (Burgess Hill, Haywards Heath and East Grinstead) since these have existing suitable facilities and transport links. Lastly Option 5 was considered which focussed on prioritising development on brownfield land.

A summary of the SA assessment scores and findings are provided in Table A-4 below, with the full assessments presented in sections 1.6 to 1.10.



Table A-4: Summary of assessments of potential impacts of the spatial Options.

| Spatial Option | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|----------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                | Housing      | Health and wellbeing | Education | Community and Crime | Flooding & surface water | Natural resources | Biodiversity & geodiversity | Landscape | Cultural heritage | Climate change & transport | Energy and waste | Water resources | Economic regeneration | Economic growth |
| 1              | +/-          | +                    | ++        | ++                  | 0                        | --                | -                           | --        | -                 | +                          | +/-              | +/-             | ++                    | ++              |
| 2              | ++           | +/-                  | +/-       | +/-                 | 0                        | --                | -                           | -         | 0                 | -                          | +/-              | +/-             | +                     | +               |
| 3              | +            | +/-                  | +/-       | +/-                 | 0                        | --                | -                           | -         | 0                 | -                          | +/-              | +/-             | -                     | +               |
| 4              | +/-          | ++                   | ++        | ++                  | 0                        | +/-               | -                           | +         | +/-               | +                          | +                | +/-             | ++                    | ++              |
| 5              | +/-          | +                    | ++        | ++                  | +                        | ++                | +/-                         | +/-       | +/-               | +                          | +                | +/-             | ++                    | ++              |

Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements (Burgess Hill, East Grinstead and Haywards Heath) accommodating greater levels of growth. This option would facilitate the proportionate delivery of housing across a range of existing settlements. This would enable residents to utilise existing services and infrastructure and would support economic growth within existing settlements. However, this option could lead to development within sensitive landscape areas, such as High Weald AONB (to the north of Haywards Heath and south/east of East Grinstead) and lead to adverse impacts on landscape, natural resources, biodiversity and geodiversity.

Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities. This option is more likely to provide protection for High Weald AONB by avoiding areas within the AONB. However, it may have a negative impact on climate change and transport objectives as new residents may not be located close to existing services and sustainable transport options, depending on the extent of services available. However, there is potential for new services to be provided where growth is outside of settlements with existing facilities.

Option 3: Creating a new and sustainable settlement with associated services and facilities. This option may have a significant negative impact on greenhouse gas emissions through increased energy use and emissions generated by the construction and occupation of the

new development, as well as increase private car use dependent on the provision of sustainable travel options.

Option 4: focus on development in the three towns. This would likely lead to a significant positive impact on economic growth and regeneration in the three towns, supporting existing businesses and supporting the vitality and viability of these town centres. By utilising existing facilities and transport routes, residents would be less dependent on private car use and would already have access to secondary schools and healthcare services. This would have a likely major positive impact on objectives for health and wellbeing, education, community and crime, climate change, and transport.

Option 5: prioritise development on brownfield land. As a predominantly rural district, brownfield sites are focussed in the three main towns and larger villages. Therefore, this Option performance on the social objectives (1 to 4) would be similar to option 4. New residents would be likely to be in proximity to healthcare services and schools, and it will also promote community cohesion by meeting housing need in the local area which reduces pressure on existing housing in the area. Proximity to services also performs well against the climate change and transport objective, as well as reducing the dependency of private car use, and associated GHG emissions. This Option would have a major positive impact on the natural resources objective by supporting the development of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. Prioritising developments on brownfield land presents an opportunity for delivery of biodiversity net gain through bringing previously developed land back to its full potential without compromising land which may have established habitats and species. Furthermore, this Option avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.

### **A.3 Feasibility of options**

The SA considered the respective likely environmental and socio-economic impacts of each of the growth strategy options. However, as outlined in Section 1.4, the SA does not reflect the whole of the analysis needed and does not consider the likelihood and feasibility of implementation. It is also not a quantitative exercise; therefore some SA objectives carry greater weighting.

Housing need and the Site Selection process informed the feasibility of the Options. An overview of the feasibility of each option in meeting housing need is outlined below.

Option 1 (the adopted District Plan) proportioned housing need across the district based on settlement category (DP4) and settlement (DP6) based on proportion of households/population. For example, if one settlement contained 10% of current households within the district, it received 10% of the housing requirement. Following the site assessment process it became evident that there were insufficient sites deemed to be 'reasonable alternatives' to continue this, since a number of developments have already come forward since the adopted plan. Many settlements did not have sufficient sites to meet the need, whereas some settlements had a need of zero, but many sites to choose

from. Therefore continuing with this option would not be achievable since it would not enable sufficient sites to be allocated to meeting housing need within the district.

Option 2 would seek to support growth across settlements with existing facilities. It would allow allocation of sites to meet internal housing needs including the provision of affordable housing and a mix of type and tenures of housing. This would also allow allocation of a surplus of approximately 1000 dwellings. This would contribute to meeting unmet need in neighbouring authorities.

Option 3 would have a major positive impact on delivering housing in the district through a new settlement. One potential location was considered that met this spatial approach, known as 'Mayfield Market Town', on the western boundary of the district near Twineham, although the majority of the site boundary is within Horsham District. However, this site was previously ruled out during the site selection process due to a historic lack of support from Horsham District Council. The site has now been withdrawn from consideration by the site promoter. In addition, water neutrality considerations arising in this location have led to deliverability concerns over and above the previous reasons for rejection.. This option is therefore not considered feasible to address housing requirements since MSDC does not have available sites to deliver such a strategy in the pool of sites identified as reasonable alternatives.

Option 4 focussed development in the three towns. This Option is similar to Option 1 by focussing development in the three urban centres, however it does not incorporate proportionate growth across the other settlements in the district and would limit the ability to meet the whole district's housing need as it would exclude larger site allocations in rural areas. It is therefore unlikely that this Option would meet the required housing need for the district, particularly as the SHELAA and Site Selection process demonstrate there is very limited growth potential at East Grinstead and Haywards Heath.

Option 5 performs well against the SA objectives, however it would not be suitable to meet housing need alone since there are limited brownfield sites available within the reasonable alternatives identified following the site selection process. The two larger brownfield sites allocated in the Regulation 19 Plan are at Burgess Hill Station and Orchards Shopping Centre in Haywards Heath which would provide 400 homes. An Urban Capacity Study has been prepared by the District Council and this has informed a Brownfield element to the windfall allowance. Overall, this figure would not come close to meeting the district's housing need in full.

Overall, Option 2 is preferable since it will support the delivery of larger strategic sites in some locations, as well as supporting some growth to across the other categories of settlements. This will enable the internal housing need to be met, along with provision of a surplus of dwellings to support neighbouring authorities in meeting their need. In SA terms it will also have positive impacts on landscape through limiting growth in sensitive landscapes.

However, it will also incorporate elements of Option 1 to continue growth at existing sustainable settlements where available sites allow.

## A.4 Option 1 Assessment

Table A-5: Assessment of Spatial Option 1.

| Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth. |        |  |
|---|--------|--|
| SA Objective  | Impact | Assessment   |
| <b>1</b><br><b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.   | +/-    | <ul style="list-style-type: none"> <li>• This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing.</li> <li>• This Option spreads new development across the main urban centres and other principal settlements within the district. It will therefore increase accessibility to new housing development across the district.</li> <li>• Lack of availability of sites for meeting housing need in each area.</li> <li>• Risk that smaller settlements in rural areas will not benefit from increased access to services.</li> </ul> |
| <b>2</b><br><b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.   | +      | <ul style="list-style-type: none"> <li>• In relation to access to health services, existing GP surgeries are associated with the medium size and larger settlements across the district, with occasional practices within the High Weald AONB.</li> <li>• There are two NHS hospitals with an A&amp;E department within the Plan area: Queen Victoria Hospital in East Grinstead and Princess Royal Hospital in Haywards Heath.</li> <li>• However, growth located in medium and smaller settlements may locate new residents at greater distances from hospital services.</li> </ul>  |

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|   |   |    |  |
|---|---|----|--|
| 3 | <p><b>Education:</b> 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</p>  | ++ | <ul style="list-style-type: none"> <li>As set out in the Mid Sussex SA Scoping Report, there are 42 primary schools and seven secondary schools serving the district. In terms of access to education, 89.8% of households within Mid Sussex are within a 15-minute walk (approximately 1.2km) from a primary school, and 64.9% of households are within 20-minute walk from a secondary school. As determined in the Reg 18 SA, this Option would locate housing growth in areas of existing settlements so new residents are likely to be in proximity to existing schools. It is noted that existing schools may be close to capacity, however it is assumed these schools can extend or adapt to predicted need.</li> </ul>  |
| 4 | <p><b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.</p> | ++ | <ul style="list-style-type: none"> <li>The spatial location and design of new development can support opportunities for social interaction and community cohesion by providing spaces and places for communities to meet or locating new development in proximity to existing community facilities, such as primary schools, community halls, libraries, public open spaces, parks, and active community groups. Such facilities are typically located in existing towns or other built-up areas. This Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns and other settlements.</li> <li>Improved access to housing and employment may contribute to a reduction in social inequalities and increase community cohesion and community health and wellbeing.</li> </ul> |

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|   |  |    |   |
|---|--|----|---|
| 5 | <p><b>Flooding and surface water:</b><br/>To reduce the risk to people, properties, the economy and the environment of flooding from all sources</p>   | 0  | <ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>   |
| 6 | <p><b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p> | -- | <ul style="list-style-type: none"> <li>This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource.</li> <li>Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.</li> </ul> |

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|   |   |   |   |
|---|---|---|---|
| 7 | <p><b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity</p>   | - | <ul style="list-style-type: none"> <li>• There are numerous Sites of Special Scientific Interest (SSSIs) within the district, predominately located within the High Weald AONB or in the South Downs National Park. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Spatial Option 1, which supports development at the three main towns, including Burgess Hill, has the potential to have adverse impacts on this SSSI.</li> <li>• The provision of significant new development has the potential to cause negative impacts on biodiversity through loss of habitat and disturbance to species. Conversely, high quality design that protects and enhances environmental and ecological characteristics, has the potential to provide some benefits. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity. However, on balance, increased development and increased population is more likely to have negative effects.</li> </ul> |
| 8 | <p><b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place</p> | - | <ul style="list-style-type: none"> <li>• This spatial strategy will follow the existing District Plan approach, which focuses new development in the main urban centres and other principal settlements across the district.</li> <li>• By focusing new development in existing urban areas / rural settlements, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district.</li> <li>• Conversely, by allocating most of the new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl.</li> <li>• New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development</li> </ul>  |

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|    |  |   |   |
|----|--|---|---|
|    |  |   | <p>and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</p> <ul style="list-style-type: none"> <li>• Nonetheless, Option 1 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.</li> </ul>  |
| 9  | <p><b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>   | - | <ul style="list-style-type: none"> <li>• New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>• There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> <li>• However, this Option has the potential to locate development in proximity to associated Conservation Areas as these are located in the main urban centres and smaller settlements.</li> </ul> |
| 10 | <p><b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the</p> | + | <ul style="list-style-type: none"> <li>• Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel.</li> </ul>   |



**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|    |  |     |   |
|----|--|-----|---|
|    | district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.   |     | <ul style="list-style-type: none"> <li>• However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced.</li> <li>• Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.</li> </ul>   |
| 11 | <b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal. | +/- | <ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul> |
| 12 | <b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  | +/- | <ul style="list-style-type: none"> <li>• It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>   |

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

|    |  |    |  |
|----|--|----|--|
| 13 | <p><b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District’s existing Town Centres and support the viability and vitality of village and neighbourhood centres.</p>                                       | ++ | <ul style="list-style-type: none"> <li>• In seeking to deliver development proportionally across the settlement hierarchy, this Option would be likely to support business in the three main towns and the village centres, as well as supporting any local retail needs in the lower category settlements.</li> </ul>   |
| 14 | <p><b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.</p> | ++ | <ul style="list-style-type: none"> <li>• This Option would be likely to support business in the three main town centres and the village centres, as well as supporting any local retail needs in the lower category settlements.</li> <li>• This Option may also serve to support the allocations for employment uses at Burgess Hill as well as allocations for employment at Handcross and Pease Pottage.</li> </ul> |

## A.5 Option 2 Assessment

Table A-6: Assessment of Spatial Option 2.

| SA Objective |   | Impact | Assessment   |
|--------------|---|--------|--|
| 1            | <b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.                     | ++     | <ul style="list-style-type: none"> <li>• This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing.</li> <li>• Option 2 would support housing growth in settlement locations where there is greater potential to improve the sustainability of the settlement by delivering new local facilities and services to meet daily needs as part of the new development.</li> <li>• This Option would support the delivery of large strategic sites in some locations as well as supporting some growth to meet local needs across the other settlements. As concluded in the Regulation 18 SA, this Option provides more certainty of the availability of sites and the deliverability of this Option in comparison to Option 1.</li> </ul> |
| 2            | <b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. | +/-    | <ul style="list-style-type: none"> <li>• Growth located in medium and smaller settlements may locate new residents at greater distances from hospital and GP services.</li> <li>• This Option seeks support growth in settlements with existing facilities. The performance of this Option is dependent on the location of the main areas of housing growth in relation to hospital and GP services. This has been assessed as part of the site assessment process.</li> </ul>   |

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|   |   |     |   |
|---|---|-----|---|
| 3 | <p><b>Education:</b> 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</p>  | +/- | <ul style="list-style-type: none"> <li>As determined in the Regulation 18 SA report, this Option would be likely to lead to the delivery of a large growth area which is anticipated to be of sufficient scale to support an additional new primary school within the site, as well as plan sustainable access routes to this school for many new residents. However, access to schools would need to be ensured through sustainable means such as school bus services and cycle routes where possible.</li> <li>The performance of this Option is dependent on the location of the main areas of housing growth in relation to schools and travel provisions.</li> </ul> |
| 4 | <p><b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.</p> | +/- | <ul style="list-style-type: none"> <li>Similar to above, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities alongside the opportunity to plan new routes for active / sustainable travel.</li> <li>The performance of this Option is dependent on the location of the main areas of housing growth in relation to community facilities.</li> </ul>   |

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|   |  |    |   |
|---|--|----|---|
| 5 | <p><b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources</p>   | 0  | <ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>   |
| 6 | <p><b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p> | -- | <ul style="list-style-type: none"> <li>This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource.</li> <li>Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.</li> </ul> |

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|   |   |   |  |
|---|---|---|--|
| 7 | <p><b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity</p>   | - | <ul style="list-style-type: none"> <li>• There are numerous SSSIs and areas of ancient woodland, within the district, predominately located within the High Weald AONB or in the South Downs National Park. Spatial Option 2, which seeks to limit growth in the settlements within the High Weald AONB would be likely to have fewer adverse impacts on these features within the AONB. Overall, this Option supports development in a sustainable location and has the potential to have fewer impacts on locally designated biodiversity sites.</li> <li>• Nonetheless, this Option is likely to require the development of greenfield sites (as opposed to the use of previously developed land) which may lead to the loss of, and adverse impacts on, priority habitats. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity.</li> <li>•</li> </ul> |
| 8 | <p><b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place</p> | - | <ul style="list-style-type: none"> <li>• This Option seeks to avoid growth in protected landscapes. The High Weald AONB covers almost half of the district. This Option is more likely to lead to development in land that is less accommodating to change than Option 1; however, it will better protect the AONB.</li> <li>• However, Option 2 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.</li> </ul>   |

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|    |   |   |  |
|----|---|---|--|
| 9  | <p><b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>  | 0 | <ul style="list-style-type: none"> <li>• This Option provides the opportunity to locate development in a location which reduces potential impacts on Conservation Areas and limits growth in the settlements in the AONB, which may also reduce the potential for impacts on associated Conservation Areas.</li> </ul>   |
| 10 | <p><b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p> | - | <ul style="list-style-type: none"> <li>• This Option supports new growth in proximity to existing lower category settlements. It is likely that these growth areas would support some mixed uses, retail, education, and community facilities as part of the new development and would be likely to require a new public transport link.</li> <li>• It is anticipated that private car usage overall, however, would be greater than if development was in an existing urban centre. The nature of the impact would depend on the location of the growth area in relation to existing public transport services and the types of facilities and services proposed as part of the development.</li> </ul> |

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|    |   |     |   |
|----|---|-----|---|
| 11 | <p><b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.</p> | +/- | <ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul> |
| 12 | <p><b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.</p>  | +/- | <ul style="list-style-type: none"> <li>• It is likely that any new development, particularly large-scale, will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• This would likely require the provision of significant new water supply and treatment infrastructure.</li> <li>• Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>  |



**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

|    |  |   |   |
|----|--|---|---|
| 13 | <p><b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.</p>                                       | + | <ul style="list-style-type: none"> <li>• This Option seeks to deliver a new growth area in the district, which is likely to lie in proximity to a lower order settlement, and limit development within the settlements located within the High Weald AONB. The level of growth proposed seeks to be able to support new retail opportunities as part of the development and, in turn, support the vitality of the associated settlement.</li> <li>• By limiting growth in the lower category settlements within the High Weald AONB, this Option may limit the viability of delivering new business opportunities associated with these settlements and have a negligible impact on village centre regeneration.</li> </ul>   |
| 14 | <p><b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.</p> | + | <ul style="list-style-type: none"> <li>• As above, this Option seeks to deliver new growth areas in the district at a level which can support new retail opportunities, employment (as well as through construction activities) and support economic growth and competitiveness which is spread across the district.</li> <li>• "Significant sites" may provide some element of local employment space. The location of the growth area is unknown and, therefore, it is uncertain if this Option would serve to support existing employment areas and local businesses. By delivering a greater level of growth there is likely to be lower levels of development in some of the main settlements.</li> <li>• It should be noted that this Option may limit the viability of delivering new business opportunities associated with these settlements.</li> </ul> |

## A.6 Option 3 Assessment

Table A-7: Assessment of Spatial Option 3.

| Option 3: Creating a new sustainable settlement with associated facilities. |        |   |
|---|--------|---|
| SA Objective  | Impact | Assessment  |
| 1   | +      | <ul style="list-style-type: none"> <li>This Option provides a means to deliver strategic-scale new housing development which would incorporate a range of housing to address various needs.</li> <li></li> </ul>  |
| 2   | +/-    | <ul style="list-style-type: none"> <li>A largescale new settlement may support the delivery of new healthcare facilities, such as a new GP practice. However, should this not come forward, existing facilities may not be in close proximity.</li> <li>This spatial strategy acknowledges that the creation of a new settlement provides opportunities to create new community facilities, such as open spaces and playing fields, which could benefit local community health and wellbeing.</li> <li>In addition, a holistically planned new development could promote walking and cycling, which could further contribute to healthy and active lifestyles.</li> </ul> |

| Option 3: Creating a new sustainable settlement with associated facilities. |  |     |   |
|---|--|-----|---|
| 3   | <b>Education:</b> 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  | +/- | <ul style="list-style-type: none"> <li>• This spatial Option is likely to include the provision of / access to education.</li> <li>• A large scale new settlement would require the provision of a primary school, as well as sustainable access routes to this school for the residents.</li> <li>• Dependent on the scale of the settlement a new secondary school may be provided. However, should this be unfeasible, access to the existing secondary schools in the district would need to be ensured through sustainable means such as school bus services and cycle routes where possible.</li> </ul>   |
| 4   | <b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities. | +/- | <ul style="list-style-type: none"> <li>• This spatial Option is likely to include the provision of significant new community services and facilities that will benefit the new community.</li> <li>• This Option may compromise social cohesion in other areas of the district, particularly where residents are unable to remain in their current settlement due to lack of housing provision.</li> <li>• However, there is a risk that other urban areas and particularly smaller settlements in rural areas will not benefit from increased access to community services and facilities.</li> </ul>          |
| 5   | <b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources  | 0   | <ul style="list-style-type: none"> <li>• The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> <li>• Nonetheless, this spatial strategy is not likely to support the reduction of flood risk to existing communities.</li> </ul> |

| Option 3: Creating a new sustainable settlement with associated facilities. |  |    |   |
|---|--|----|---|
| 6   | <b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.      | -- | <ul style="list-style-type: none"> <li>Most of the district (63.7%) is classified as Grade 3 Agricultural Land. It is likely that some of this land would be classified as Grade 3a and therefore Best and Most Versatile (BMV) land. Grade 3 land surrounds many settlements, including main settlements as well as the lower order settlements. Due to the distribution of potential BMV land across the district, it is likely that the delivery of new settlement would lead to the loss of BMV land.</li> </ul>  |
| 7   | <b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity   | -  | <p>This spatial strategy would likely involve the loss of a large area of (greenfield) countryside to accommodate the new settlement and a range of ancillary development (highways, energy supply, sewerage, water supply, etc). This would result in significant habitat loss and create long-term damage and disturbance to habitats and species. Overall, it is anticipated that this would likely result in an overall loss of biodiversity in the district. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity.</p>   |
| 8   | <b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place | -  | <ul style="list-style-type: none"> <li>This spatial Option will focus development in a new settlement. This is likely to have a significant local landscape impact, which would need to be comprehensively mitigated through sensitive site selection and ensuring high-quality design.</li> <li>By focusing most new development in one main area, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in other parts of the district.</li> <li>New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact</li> </ul> |

| Option 3: Creating a new sustainable settlement with associated facilities. |  |   |  |
|---|--|---|--|
|   |  |   | could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.   |
| 9   | <b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.  | 0 | <ul style="list-style-type: none"> <li>• New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>• However, this spatial strategy approach could contribute to this SA objective by focusing development in one area, reducing the risk that heritage features and historic landscape character outside this area could be affected.</li> </ul>  |
| 10  | <b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. | - | <ul style="list-style-type: none"> <li>• It is likely that the creation of a new settlement will have a negative effect on local air quality within the district, through major new construction works and increased traffic emissions. Focusing major new development in one area creates a greater risk of contributing to the formation of a significant local air quality issue.</li> <li>• It is possible that this spatial strategy will have a significant negative effect on greenhouse gas emissions, through increased energy use and emissions generated by the construction and occupation of the new development.</li> <li>• Such an approach has the potential to cause a significant increase in greenhouse gas emissions associated with private car use.</li> <li>• Appropriate policy provisions will be required to ensure that greenhouse gas emissions associated with new development are minimised. This should include measures to minimise emissions at source, through the promotion of</li> </ul> |

| Option 3: Creating a new sustainable settlement with associated facilities. |  |     |   |
|---|--|-----|---|
|   |  |     | low-carbon design and energy efficient design, and measures to minimise the reliance on private car use.  |
| 11  | <b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal. | +/- | <ul style="list-style-type: none"> <li>• A new settlement would likely require the provision of new waste management infrastructure. By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities/services.</li> <li>• However, it also presents the opportunity to incorporate energy efficient design and implement renewable energy provisions.</li> </ul>  |
| 12  | <b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  | -   | <ul style="list-style-type: none"> <li>• It is likely that large-scale new development will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• This would likely require the provision of significant new water supply and treatment infrastructure as the new settlement would likely be in a location without existing infrastructure.</li> <li>• Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul> |

| Option 3: Creating a new sustainable settlement with associated facilities. |   |   |   |
|---|---|---|---|
| 13  | <b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.                                       | - | <ul style="list-style-type: none"> <li>• This spatial Option would not support the regeneration of existing Town Centres and villages in the district.</li> <li>• Through appropriate design and ensuring the required services and facilities are provided with a new settlement, then residents would be unlikely to travel into existing town centres within the district.</li> </ul>  |
| 14  | <b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities. | + | <ul style="list-style-type: none"> <li>• The scale of new development required by this spatial strategy has the potential to create a significant economic stimulus and promote employment opportunities across the district and within communities, as opposed to focused mainly in the town centres.</li> <li>• Furthermore, should provision of transport links be secured, this could encourage inward investment in the district.</li> </ul> |

## A.7 Option 4 Assessment

Table A-8: Assessment of Spatial Option 4.

| Option 4: Focus development in the three towns utilising existing facilities and transport links. |   |        |  |
|---|---|--------|--|
| SA Objective  |   | Impact | Assessment   |
| 1   | <b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.                     | +/-    | <ul style="list-style-type: none"> <li>This Option focuses new development to the main urban centres in district. It will therefore increase accessibility to new housing development in existing Town Centres. However, there would not be increased access to housing within rural areas of the district and this approach could lead to urban sprawl of the three towns.</li> </ul>   |
| 2   | <b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. | +      | <ul style="list-style-type: none"> <li>Increasing growth at the three main towns would be likely to locate residents in proximity to a range of existing healthcare services which would be expected to increase capacity to meet the increase in demand from new households.</li> <li>The main A&amp;E department for the district is located in Haywards Heath, with Queen Victoria Hospital in East Grinstead and Priory Hospital on the outskirts of Burgess Hill. Therefore, new residents will be located with sustainable access to medical services.</li> <li>Health and wellbeing also include active travel and so, development in town centres allows residents to walk or cycle daily to a range of services and recreational offerings as well as work. This in turn encourages a more social community environment where all residents have access to community facilities.</li> </ul> |



| Option 4: Focus development in the three towns utilising existing facilities and transport links. |  |    |  |
|---|--|----|--|
| 3   | <b>Education:</b> 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  | +  | <ul style="list-style-type: none"> <li>There are existing secondary schools in the three towns - Burgess Hill (Oakmeads Community College and St Paul's Catholic College), East Grinstead (Sackville Community College and Imberhorne School), Haywards Heath (Oathall Community College). Therefore, residents would already have access to secondary schools and so would have a positive impact on this objective. It is noted that these schools may be nearing capacity, however MSDC would be able to plan for extending or adapting these school to meet predicted need.</li> </ul>   |
| 4   | <b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities. | ++ | <ul style="list-style-type: none"> <li>Facilities which promote social interaction and community cohesion are often located in existing towns (such as primary schools, community halls, libraries, public open spaces, parks, and active community groups). Therefore, like Option 1, this Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns.</li> <li>Furthermore, by providing more housing in the main towns, this will prevent inflated housing and rental prices and reduce social inequalities due to a lack of available housing.</li> </ul> |
| 5   | <b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources  | 0  | <ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>  |

| Option 4: Focus development in the three towns utilising existing facilities and transport links. |  |     |   |
|---|--|-----|---|
| 6   | <b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.      | +/- | <ul style="list-style-type: none"> <li>• Focusing development in the main town centres will provide opportunities to redevelop previously developed land.</li> <li>• However, it will still be likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously development land. The development of greenfield sites could lead to the loss of soils, which is a finite natural resource.</li> <li>•</li> </ul>   |
| 7   | <b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity   | -   | <ul style="list-style-type: none"> <li>• There are numerous SSSIs within the district, predominately located within the High Weald AONB or in the South Downs National Park. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Focussing development around the three towns including Burgess Hill, has the potential to have adverse impacts on this SSSI.</li> </ul>   |
| 8   | <b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place | +   | <ul style="list-style-type: none"> <li>• By focusing new development in existing urban areas, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district.</li> <li>• New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</li> <li>• It should be noted that by allocating most new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl.</li> </ul> |

| Option 4: Focus development in the three towns utilising existing facilities and transport links. |  |     |  |
|---|--|-----|--|
| 9   | <b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.  | +/- | <ul style="list-style-type: none"> <li>• New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>• However, this Option could contribute to this SA objective. By focusing development in existing urban areas, this reduces the risk that heritage features and historic landscape character outside these areas could be affected. In addition, it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> </ul>  |
| 10  | <b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. | +   | <ul style="list-style-type: none"> <li>• Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel.</li> <li>• However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced.</li> <li>• Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.</li> </ul> |

| Option 4: Focus development in the three towns utilising existing facilities and transport links. |  |     |   |
|---|--|-----|---|
| 11  | <b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal. | +   | <ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul> |
| 12  | <b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  | +/- | <ul style="list-style-type: none"> <li>• It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>   |
| 13  | <b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.                | ++  | <ul style="list-style-type: none"> <li>• This Option prioritises development in the three main towns - Burgess Hill, Haywards Heath, and East Grinstead - so would deliver housing growth in locations which would help to support existing businesses located in the main centres, supporting the vitality and viability of town centre regeneration.</li> </ul>   |
| 14  | <b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and  | +   | <ul style="list-style-type: none"> <li>• This Option would have a minor positive impact on economic growth by reducing out commuting.</li> </ul>  |

**Option 4: Focus development in the three towns utilising existing facilities and transport links.**

|  |   |  |  |
|--|---|--|--|
|  | stable levels of employment including the opportunity for people to live and work within their communities. |  | <ul style="list-style-type: none"><li>• However, this growth would be focused in the main towns, whereas developments in both main towns and new or smaller areas would provide more opportunities for employment across the District.</li></ul> |
|--|---|--|--|

## A.8 Option 5 Assessment

Table A-9: Assessment of Spatial Option 5.

| Option 5: Prioritise development on brownfield land.   |        |  |
|--|--------|--|
| SA Objective   | Impact | Assessment   |
| 1<br><b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.   | +/-    | <ul style="list-style-type: none"> <li>• Prioritising brownfield sites limits the location and size of developments and would be unlikely to have a significant contribution to meeting all housing need.</li> <li>• Mid Sussex has limited brownfield sites available for development. The two larger brownfield sites allocated in the plan are at Burgess Hill Station and Orchards Shopping Centre.</li> </ul> |
| 2<br><b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.   | +      | <ul style="list-style-type: none"> <li>• Brownfield sites are mostly located in existing / established communities so new residents are likely to be in proximity to healthcare services.</li> <li>• For example, the brownfield site at Orchards Shopping Centre is located in Haywards Heath which has a Hospital with an A&amp;E Department.</li> </ul>   |
| 3<br><b>Education:</b> 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             | ++     | <ul style="list-style-type: none"> <li>• As a predominantly rural district, brownfield sites are focused in the three main towns and larger villages. New residents are likely to be in proximity to secondary schools.</li> </ul>   |
| 4<br><b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain | ++     | <ul style="list-style-type: none"> <li>• Promotes community cohesion by meeting housing need in the local area which prevents increased housing and rental prices.</li> <li>• Provision of new houses in existing areas serviced by community facilities may support their maintenance.</li> </ul>   |

| Option 5: Prioritise development on brownfield land. |   |     |   |
|--|---|-----|---|
|  | their separate identities.  |     |   |
| 5  | <b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources   | +   | <ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. Implementation of sustainable drainage at all brownfield developments is required in accordance with Policy DPS4 of the revised Plan Strategy. Therefore, this Option would have a minor positive impact on the flooding and surface water objective as it may reduce the flood risk at existing brownfield sites.</li> </ul> |
| 6  | <b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance. | ++  | <ul style="list-style-type: none"> <li>Option 5 would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development on greenfield sites, Mineral Safeguarding Areas or the encroachment of open countryside and agricultural land.</li> </ul>  |
| 7  | <b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity  | +/- | <ul style="list-style-type: none"> <li>Prioritising developments on brownfield land presents an opportunity for biodiversity net gain.</li> <li>Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.</li> </ul>  |
| 8  | <b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's   | +/- | <ul style="list-style-type: none"> <li>Prioritising developments on brownfield land presents an opportunity for introducing high quality design in the context of local landscape</li> </ul>  |

| Option 5: Prioritise development on brownfield land. |   |     |   |
|--|---|-----|---|
|  | countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place  |     | <p>character. Furthermore, it avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.</p> <ul style="list-style-type: none"> <li>Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.</li> </ul>  |
| 9  | <b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.   | +/- | <ul style="list-style-type: none"> <li>New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> </ul> |
| 10   | <b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, | +   | <ul style="list-style-type: none"> <li>Residents will be less reliant on private car use and associated GHG emissions since most brownfield sites are located in existing towns with existing transport and infrastructure provision.</li> </ul>  |



| Option 5: Prioritise development on brownfield land. |  |     |  |
|--|--|-----|--|
|  | thereby reducing the level of greenhouse gases from private cars and their impact on climate change.   |     |  |
| 11   | <b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal. | +   | <ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of brownfield land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul> |
| 12   | <b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.  | +/- | <ul style="list-style-type: none"> <li>• It is possible that the redevelopment of brownfield land would negatively impact water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> <li>• However, due to limited brownfield sites available, this may also limit the pressure on water resources.</li> </ul>   |

| Option 5: Prioritise development on brownfield land. |   |  |
|--|---|--|
| 13   | <b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.                                       | <p>++</p> <ul style="list-style-type: none"> <li>This Option would revitalise areas of the Town Centres which are currently vacant or in disrepair.</li> <li>The delivery of new development on brownfield sites - particularly at Burgess Hill and Orchards Shopping Centre - should promote development in these urban centres where services and jobs are most accessible.</li> </ul> |
| 14   | <b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities. | <p>++</p> <ul style="list-style-type: none"> <li>By delivering new development on brownfield sites in Town Centres (such as at Burgess Hill Station and Oaklands Shopping Centre in Haywards Heath), this will place new residents in areas where services and jobs are accessible and existing businesses can be supported.</li> </ul>  |

## B Appraisal of Policies in the Mid Sussex District Plan Review 2021 – 2039

### B.1 Introduction

As outlined in Section 5, an assessment of the 85 draft policies against the SA framework was undertaken and presented in the Regulation 18 SA, 26 of these are site allocation policies which set site specific requirements to guide development.

Following consultation on the Regulation 18 Plan and SA, several updates have been made to these policies.

### B.2 Reasonable Alternatives

For all policies that were reviewed and amended, the Council could potentially have included a range of different alternative wordings or approaches.

The SEA Regulations require the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. More specifically, Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of '*an outline of the reasons for selecting the alternatives dealt with*'.

The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the National Planning Policy Framework (NPPF)).

For all new policies and existing policies where major updates were proposed to form part of the updated District Plan, the Council identified a range of reasonable alternatives. Alternatives were not identified where no updates to adopted policies were required, or a minor update was undertaken, since these were assessed against the SA framework for the adopted District Plan in 2014 and the policy purpose/meaning has not changed. These policies are also known to conform with the Plan's objectives.

However, an assessment of alternative policies was not included in the Regulation 18 SA. As a result, to provide this context, assessment of the sustainability performance of all reasonable alternatives to major policy updates and new policies considered since the adopted plan is included below to provide justification of the reasoning behind selection of the preferred option.

### B.3 Overview of policy updates

Table B-1 below presents an overview of where alternatives were considered for policies and the updates included in the Regulation 19 Plan following the Regulation 18 Plan consultation period.

All of the policies, as well as their reasonable alternatives, have been assessed to the same level of detail to identify their likely sustainability impacts. This assessment is presented in Sections B.5 to B.14 below.

The SEA Regulations require the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. More specifically, Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of '*an outline of the reasons for selecting the alternatives dealt with*'.

The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the National Planning Policy Framework (NPPF)).

For all new policies and existing policies where major updates were proposed to form part of the updated District Plan, the Council identified a range of reasonable alternatives. Alternatives were not identified where no updates to adopted policies were required, or a minor update was undertaken, since these were assessed against the SA framework for the adopted District Plan in 2014 and the policy purpose/meaning has not changed. These policies are also known to conform with the Plan's objectives.

However, an assessment of alternative policies was not included in the Regulation 18 SA. As a result, to provide this context, assessment of the sustainability performance of all reasonable alternatives to major policy updates and new policies considered since the adopted plan is included below to provide justification of the reasoning behind selection of the preferred option.

Table B-1: Overview of Policy updates and reasonable alternatives.

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name                             | Status (Reg 18) | Status (Reg 19) | Alternatives  |
|--------------------------------------|--------------------------------|---|-----------------|-----------------|---|
| <b>Sustainability</b>                |                                |   |                 |                 |   |
| DPS1                                 | DPS1                           | Climate change                          | New policy      | n/a             | No alternatives since the NPPF includes requirement to mitigate climate change  |
| DPS2                                 | DPS2                           | Sustainable Design and Construction     | Major update    | n/a             | See Section B.5.2 below for further details. <b>Energy:</b> five alternatives; <b>Water:</b> two alternatives; <b>Renewable and low carbon energy:</b> three alternatives; <b>Existing buildings:</b> three alternatives; <b>Carbon sequestration:</b> two alternatives |
| DPS3                                 | DPS3                           | Renewable and Low Carbon Energy Schemes | Minor update    | n/a             | n/a as minor update   |
| DPS4                                 | DPS4                           | Flood Risk and Sustainable Drainage     | No update       | Major update    | No alternatives as update required following major Planning Practice Guidance update.   |
| DPS5                                 | criteria covered under DPN6    | Water Environment                       | Minor update    | n/a             | n/a as minor update   |
|                                      | DPI7                           | Water and Wastewater Infrastructure     | n/a             | New Policy      |   |
| DPS6                                 | DPS6                           | Health and Wellbeing                    | New Policy      | n/a             | No alternative option, resulted from introduction of other policies (DPB1, DPT3, DPT2, DPN3 and other DPN policies, DPI1, DPI5, DPI6, DPE policies, DPS1)   |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name                                    | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|--|
| n/a                                  | DPS5                           | Water neutrality                               | n/a             | New policy      | 1) Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone)<br>2) Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C. |
| <b>Natural Environment and GI</b>    |                                |  |                 |                 |  |
| DPN1                                 | DPN1                           | Biodiversity, Geodiversity and Nature Recovery | Major update    | n/a             | No alternatives. Updated to include reference to nature recovery and Local Nature Recovery Strategy and to reflect best practice, required under legislation.  |
| DPN2                                 | DPN2                           | Biodiversity Net Gain                          | New Policy      | n/a             | 1) No Policy - rely on legislation and national policy and guidance<br>2) Local policy reflects to meet national requirement and add a local perspective<br>3) Have a policy that goes beyond national requirement   |
| DPN3                                 | DPN3                           | Green and Blue Infrastructure                  | New Policy      | n/a             | 1) have a policy that contributes to the establishment of GI and supports development of connected network of multi-functional green space.<br>2) As option 1 but safeguards land around Burgess Hill for delivery of multi-functional   |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name                               | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|---|-----------------|-----------------|--|
|                                      |                                |   |                 |                 | 'Green Circle'.<br>3) To not have a policy and rely on national policy and guidance  |
| DPN4                                 | DPN4                           | Trees, Woodland and Hedgerows             | Minor update    | n/a             | n/a as minor update  |
| DPN5                                 | DPN5                           | Historic Parks and Gardens                | No update       | Minor update    | n/a as minor update  |
| DPN6                                 | DPN6                           | Pollution                                 | New Policy      | n/a             | No alternatives as came from general update of DP29 which has been split into three policies. Required under changes in national guidance. |
| DPN7                                 | DPN7                           | Noise Impacts                             | Minor update    | n/a             | n/a as minor update  |
| DPN8                                 | DPN8                           | Light Impacts and Dark Skies              | Minor update    | n/a             | n/a as minor update  |
| DPN9                                 | DPN9                           | Air Quality                               | Minor update    | n/a             | n/a as minor update  |
| DPN10                                | DPN10                          | Land Stability and Contaminated Land      | New policy      | n/a             | No options as required under national legislation.   |
| <b>Countryside</b>                   |                                |   |                 |                 |  |
| DPC1                                 | DPC1                           | Protection and Enhancement of Countryside | Minor update    | n/a             | n/a as minor update  |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name                                   | Status (Reg 18) | Status (Reg 19) | Alternatives  |
|--------------------------------------|--------------------------------|---|-----------------|-----------------|---|
| DPC2                                 | DPC2                           | Preventing Coalescence                        | No update       | Minor           | n/a as minor update   |
| DPC3                                 | DPC3                           | New Homes in the Countryside                  | Minor update    | n/a             | n/a as minor update   |
| DPC4                                 | DPC4                           | High Weald Area of Outstanding Natural Beauty | Minor update    | n/a             | n/a as minor update   |
| DPC5                                 | DPC5                           | Setting of the South Downs National Park      | No update       | Minor update    | n/a as minor update   |
| DPC6                                 | DPC6                           | Ashdown Forest SPA and SAC                    | Minor update    | n/a             | n/a as minor update   |
| <b>Built Environment</b>             |                                |   |                 |                 |   |
| DPB1                                 | DPB1                           | Character and Design                          | Minor update    | n/a             | n/a as minor update   |
| DPB2                                 | DPB2                           | Listed Buildings and Other Heritage Assets    | Minor update    | n/a             | n/a as minor update   |
| DPB3                                 | DPB3                           | Conservation Areas                            | No update       | Minor update    | n/a as minor update   |
|                                      | DPB4                           | Aerodrome Safeguarding                        | n/a             | New Policy      | 1) add a policy on aerodrome safeguarding<br>2) Do not include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003 |
| <b>Transport</b>                     |                                |   |                 |                 |   |



| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|--|
| DPT1                                 | DPT1                           | Placemaking and Connectivity                         | Major update    | n/a             | 1) simple update to existing policy to address changes to NPPF<br>2) Provide granular policies to maximise outcome     |
| DPT2                                 | DTP2                           | Rights of Way and Other Recreational Routes          | No update       | n/a             | n/a as no update   |
| DPT3                                 | DPT3                           | Active Travel  | New Policy      | n/a             | 1) Rely on West Sussex transport plan<br>2) Create policy with specific emphasis on active travel for greater emphasis |
| DPT4                                 | DPT4                           | Parking and Electric Vehicle Charging Infrastructure | New Policy      | n/a             | 1) Rely on West Sussex Transport Plan<br>2) Seek higher standards locally  |
| DPT5                                 | DPT5                           | Off-Airport Car Parking                              | New Policy      | n/a             | Rely on non-specific West Sussex transport plan / sustainable travel policies.   |
| <b>Economy</b>                       |                                |  |                 |                 |  |
| DPE1                                 | DPE1                           | Sustainable Economic Development                     | Major Update    | n/a             | No options as updated to reflect changes in NPPF.  |
| DPE2                                 | DPE2                           | Existing Employment Sites                            | Minor update    | n/a             | n/a as minor update  |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name   | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|---|-----------------|-----------------|--|
| DPE3                                 | DPE3                           | Employment Allocations                              | New policy      | n/a             | 1) Need approach: no allocations<br>2) Opportunity approach: provide mix used development on significant sites to create sustainable communities<br>3) over-supply approach: allocate site above and beyond Option 1 and 2 (spatial strategy principles) |
| DPE4                                 | DPE4                           | Town and Village Centres                            | Major update    | n/a             | No options as updated to reflect changes in NPPF.  |
| DPE5                                 | DPE5                           | Within Town and Village Centre Boundaries           | Major update    | n/a             | No options as updated to reflect changes in NPPF.  |
| DPE6                                 | DPE6                           | Within Primary Shopping Areas                       | Major update    | n/a             | No options as updated to reflect changes in NPPF.  |
| DPE7                                 | DPE7                           | Smaller Village and Neighbourhood Centres           | Major update    | n/a             | No options as updated to reflect changes to Permitted Development Rights and NPPF.   |
| DPE8                                 | DPE8                           | Sustainable Rural Development and the Rural Economy | Minor update    | n/a             | n/a as minor update  |
| DEP9                                 | DPE9                           | Sustainable Tourism and the Visitor Economy         | Minor update    | n/a             | n/a as minor update  |
| <b>Sustainable Communities</b>       |                                |   |                 |                 |  |

| Existing plan policy number (Reg 18)  | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives  |
|---------------------------------------|--------------------------------|--|-----------------|-----------------|---|
| DPSC1                                 | DPSC1                          | Land to the West of Burgess Hill and north of Hurstpierpoint | New policy      | n/a             | Site allocation - alternatives assessed within site assessment  |
| DPSC2                                 | DPSC3                          | Land to the South of Reeds Lane, Sayers Common               | New policy      | n/a             | Site allocation - alternatives assessed within site assessment  |
| DPSC3                                 | DPSC2                          | Land at Crabbet Park   | New policy      | n/a             | Site allocation - alternatives assessed within site assessment  |
|                                       | DPSC GEN                       | Significant Site Requirements                                | n/a             | New policy      | n/a - includes the criteria relevant to Significant Sites from Policy DPH4  |
| <b>Housing Policy and Allocations</b> |                                |  |                 |                 |   |
| DPH1                                  | DPH1                           | Housing  | Major update    | n/a             | 1) Housing requirement approach: meet the housing requirement calculated for Mid Sussex by allocating the most suitable sites in line with the site selection methodology<br>2) higher growth approach: identify sites above and beyond housing requirement |
| DPH2                                  | DPH2                           | Sustainable Development - Outside the Built Up Area          | New Policy      | n/a             | No reasonable alternatives as policy is required to support plan delivery.  |
| DPH3                                  | DPH3                           | Sustainable Development - Inside the Built Up Area           | New Policy      | n/a             | No reasonable alternatives as policy is required to support plan delivery.  |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|--|
| DPH4                                 | DPH4                           | General Principles for Housing Allocations                 | New Policy      | Deleted         | This policy was a list of criteria reflecting other policies in the plan and national guidance.<br>Criteria within the policy have been moved to other relevant policies within the plan.                                |
| DPH5                                 | DPA1                           | Batchelors Farm, Keymer Road, Burgess Hill                 | New policy      | n/a             | Site allocation - alternatives assessed within site assessment   |
| DPH6                                 | DPA2                           | Land at South of Appletree Close, Janes Lane, Burgess Hill | New policy      | n/a             | Site allocation - alternatives assessed within site assessment   |
| DPH7                                 | DPA3                           | Burgess Hill Station, Burgess Hill                         | New policy      | n/a             | Site allocation - alternatives assessed within site assessment   |
|                                      | DPA3a                          | Allotment site: Nightingale Lane, Burgess Hill             | n/a             | New policy      | 1) Allocate the Burgess Hill Station site with a policy requirement for the reprovision of allotments in line with policy DPI5<br>2) Allocate the Burgess Hill Station site and a site for the reprovision of allotments |
| DPH8                                 | DPA4                           | Land off West Hoathly Road, East Grinstead                 | New policy      | n/a             | Site allocation - alternatives assessed within site assessment   |
| DPH9                                 | DPA5                           | Land at Hurstwood Lane, Haywards Heath                     | New policy      | n/a             | Site allocation - alternatives assessed within site assessment   |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|--|
| DPH10                                | DPA6                           | Land at Junction of Hurstwood Lane and Colewell Lane, Haywards Heath | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH11                                | DPA7                           | Land east of Borde Hill Lane, Haywards Heath                         | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH12                                | DPA8                           | Orchards Shopping Centre, Haywards Heath                             | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH13                                | DPA9                           | Land to West of Turners Hill Road, Crawley Down                      | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH14                                | DPA10                          | Hurst Farm, Turners Hill Road, Crawley Down                          | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH15                                | DPA11                          | Land rear of 2 Hurst Road, Hassocks                                  | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH16                                | DPA12                          | Land west of Kemps, Hustpierpoint                                    | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH17                                | DPA13                          | The Paddocks, Lewes Road, Ashurst Wood                               | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH18                                | DPA14                          | Land at Foxhole Farm, Bolney   | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH19                                | DPSC4                          | Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common        | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|--|
| DPH20                                | DPSC5                          | Land at Coombe Farm, London Road, Sayers Common                      | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH21                                | DPSC6                          | Land to the West of Kings Business Centre, Reeds Lane, Sayers Common | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH22                                | DPSC7                          | Land at LVS Hassocks, London Road, Sayers Common                     | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH23                                | DPA15                          | Ham Lane Farm House, Ham Lane, Scaynes Hill                          | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH24                                | DPA16                          | Challoners, Cuckfield Road, Ansty                                    | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH25                                | DPA17                          | Land to the west of Marwick Close, Bolney Road, Ansty                | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH26                                | DPH4                           | Older Persons Housing and Specialist Accommodation                   | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH27                                | DPA18                          | Land at Byanda, Hassoccks  | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |
| DPH28                                | DPA19                          | Land at Hyde Lodge, Handcross  | New policy      | n/a             | Site allocation - alternatives assessed within site assessment |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name                                   | Status (Reg 18) | Status (Reg 19) | Alternatives   |
|--------------------------------------|--------------------------------|---|-----------------|-----------------|--|
| DPH29                                | DPH5                           | Gypsies, Travellers and Travelling Showpeople | Major update    | n/a             | 1) address need during the plan period<br>2) allocate site to address surplus need from neighbouring authorities   |
| DPH30                                | DPH6                           | Self and Custom Build Housing                 | New policy      | n/a             | 1) rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place<br>2) develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations |
| DPH31                                | DPH7                           | Housing Mix                                   | Major update    | n/a             | No reasonable alternatives - evidence led  |
| DPH32                                | DPH8                           | Affordable Housing                            | Minor update    | n/a             | n/a as minor update  |
| DPH33                                | DPH9                           | First Homes                                   | New Policy      | n/a             | No reasonable alternatives - evidence led  |
| DPH34                                | DPH10                          | Rural Exception Sites                         | Minor update    | n/a             | n/a as minor update  |
| DPH35                                | DPH11                          | Dwelling Space Standards                      | No update       | n/a             | n/a as no update   |
| DPH36                                | DPH12                          | Accessibility                                 | Minor update    | n/a             | n/a as minor update  |

| Existing plan policy number (Reg 18) | Updated policy number (Reg 19) | Policy Name  | Status (Reg 18) | Status (Reg 19) | Alternatives  |
|--------------------------------------|--------------------------------|--|-----------------|-----------------|---|
| <b>Infrastructure</b>                |                                |  |                 |                 |   |
| DPI1                                 | DPI1                           | Securing Infrastructure                              | Major update    | n/a             | 1) have a detailed policy with expectation for all proposals<br>2) to rely on national policy   |
| DPI2                                 | DPI2                           | Planning Obligations                                 | New policy      | n/a             | No options as driven by requirements of Planning Practice Guidance (sets out developer obligation requirements within plan), regulations and evidence |
| DPI3                                 | DPI3                           | Major Infrastructure Projects                        | New policy      | n/a             | No reasonable alternatives identified   |
| DPI4                                 | DPI4                           | Communications Infrastructure                        | Minor update    | n/a             | n/a as minor update   |
| DPI5                                 | DPI5                           | Open Space, Sport and Recreational Facilities        | Minor update    | n/a             | n/a as minor update   |
| DPI6                                 | DPI6                           | Community and Cultural Facilities and Local Services | Minor update    | n/a             | n/a as minor update   |
| DPI7                                 | DPI8                           | Viability  | Minor update    | n/a             | n/a as minor update   |



## **B.4 Policy Assessment**

The following section presents an assessment of each preferred policy and the alternative options considered, where relevant, to support the inclusion of the preferred policy option within the plan.

The 85 preferred draft policies (including 26 site allocation policies) were assessed at the Regulation 18 stage by Lepus Consulting. This assessment remains valid and therefore policies have not been re-assessed unless updates were made following the Regulation 18 consultation, as summarised in Table B-1 above and detailed below.

The below section therefore presents the findings of the assessment undertaken by Lepus Consulting, along with a new assessment of the alternatives that were considered, and any updates following consultation.

## **B.5 Sustainability**

### **B.5.1 DPS1: Climate Change**

Policy DPS1 seeks to ensure that future development in the Plan area contributes to the mitigation of, and adaption to, climate change. The policy refers to other policies within the District Plan which relate to achieving the Council's climate change goals. The policy sets out the Council's approach to climate change, covering topics such as reducing carbon emissions and maximising carbon sequestration within the Plan area.

There were no alternatives considered for this policy since the NPPF includes a requirement to mitigate climate change. There has been no update to this policy since the Regulation 18 Plan, except for minor wording changes, and so the Regulation 18 SA assessment undertaken by Lepus remains unchanged. Lepus' full assessment summary is included below with the relevant edits.

Table B-2: Sustainability performance of Policy DPS1.

| Policy Option DPS1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | +                        | +                 | +                           | 0         | 0                 | ++                         | +                | +               | 0                     | 0               |

The policy covers a wide range of themes to provide support and guidance for development proposals. This includes stating that new developments “*will be required to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings*” whilst supporting renewable and low carbon schemes. Additionally, active travel is supported within the policy whereby new developments “*prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles*”. This could help to encourage physical exercise and reduce emission of harmful air pollutants. Major positive impacts on climate change and transport within the Plan area would be expected through the criteria outlined within this policy (SA Objective 10), as well as minor positive impacts on energy and waste and human health (SA Objectives 2 and 11).

Policy DPS1 requires all development to be designed to “*minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply*”. Additionally, the incorporation of requirements for biodiversity net gain, nature-based solutions to flood risk, tree protection, and the protection and provision of green infrastructure (GI) throughout the Plan area as a result of this policy, and other related policies within the Plan, would be likely to have positive impacts on flood management and habitat creation and protection. Therefore, a minor positive impact on flooding and biodiversity could be expected (SA Objectives 5 and 7). By aiming to protect water supplies within the Plan area from the effects of climate change, which could include prolonged periods of drought or water scarcity, a minor positive impact on water resources could result (SA Objective 12) by improving infrastructure preparedness to these events.

The policy outlines that “*development will be required to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage*”, which could help to promote efficient use of land and the conservation of finite soil

resources and ecosystem services they provide. The policy could therefore lead to a minor positive impact on natural resources through protection of ecologically and agriculturally important soils, potentially including BMV land, within the Plan area (SA Objective 6).

### B.5.2 DPS2: Sustainable Design and Construction

Policy DPS2 seeks to ensure that all development proposals will be expected to “*contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability*” within every phase of a project. Additionally, the policy sets out various design standard targets for future development proposals to achieve, amongst relevant national standards and other MSDPR policies, in order to combat climate change and its potential impacts.

Since the Regulation 18 Plan, this policy has been reworded. Five alternative policies were also considered since Regulation 18, which are outlined in

Table B-3 below and assessed against the SA Objectives in Table B-4.

Table B-3: Reasonable alternatives for Policy DPS2.

| Alternatives for Policy DPS2    |  |
|---------------------------------|--|
| Energy                          | <ol style="list-style-type: none"> <li>1: Rely on building regulations</li> <li>2: Set a requirement to reduce emissions by a certain percentage</li> <li>3: Set a target via third-party assessment scheme</li> <li>4: Set performance targets</li> <li>5: Introduce post-occupancy monitoring of building requirement</li> </ol> |
| Water                           | <ol style="list-style-type: none"> <li>1: Continue using current guideline and policy</li> <li>2: Set tighter water efficiency standards</li> </ol>  |
| Renewable and low carbon energy | <ol style="list-style-type: none"> <li>1: Set out overarching criteria</li> <li>2: Set out criteria for each type of energy technology</li> <li>3: Actively support community renewable energy schemes</li> </ol>  |
| Existing buildings              | <ol style="list-style-type: none"> <li>1: Provide guidance on sustainable retrofitting</li> <li>2: Support consequential improvement as part of works to smaller building</li> </ol>   |
| Carbon sequestration            | <ol style="list-style-type: none"> <li>1: Continue with reg 18 policy</li> <li>2: Strengthen policy wording</li> </ol>   |

Table B-4: Sustainability performance of reasonable alternatives for Policy DPS2.

| Policy Option  | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|  | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|  | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPS2   | 0            | +                    | 0         | 0                   | +                        | +                 | +                           | 0         | 0                 | +                          | ++               | ++              | 0                     | 0               |
| <b>Alternatives: Energy</b>                          |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1  | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 2  | 0            | +                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | 0               |
| 3  | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | 0               |
| 4  | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | 0               |
| 5  | 0            | ++                   | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | 0               |
| <b>Alternatives: Water</b>                           |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |
| 2  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | ++              | 0                     | 0               |
| <b>Alternatives: Renewable and low carbon energy</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 2  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 3  | 0            | +                    | +         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | +               |
| <b>Alternatives: Existing buildings</b>              |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1  | 0            | 0                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 2  | 0            | 0                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 3  | 0            | 0                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | ++                         | ++               | 0               | 0                     | 0               |
| <b>Alternatives: Carbon sequestration</b>            |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |
| 2  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | 0                     | 0               |

## Energy

Policy DPS2 seeks to ensure that all development proposals will be expected to "contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability" within every phase of a project. Drawing upon building

regulations and introducing post-occupancy monitoring of building requirements will help to monitor this contribution to the reduction of carbon emissions.

It is considered that the introduction of post-occupancy monitoring of building requirements would have a significant positive impact on the health and wellbeing of building users. In contrast, simply setting targets for reduction in emissions would be a step in the right direction but there would need to be a requirement to meet these targets.

## Water

Policy DPS3 also regards water resource management within the district and establishes criteria for proposals to meet to be supported by the Council. Setting tighter water efficiency standards would have a positive impact on water resources. Additionally, this policy states that new developments are to incorporate designs which maximise efficient use of water resources through rainwater harvesting, greywater recycling and the integration of SUDs. This could have positive impacts on biodiversity through habitat creation.

## Renewable and low carbon energy

Supporting community renewable energy schemes may improve the wellbeing of the community. This may also facilitate learning and education of renewable energy across the community.

## Existing buildings

All of the options considered for existing buildings would likely have minor or major positive impacts on climate change and managing energy and waste. All developments would be expected to be energy efficient and follow the waste hierarchy to minimise the amount of waste produced.

## Carbon sequestration

Policy seeks to improve energy efficiency of developments which could lead to the reduction of overall carbon emissions and help mitigate climate change.

### B.5.3 DPS3: Renewable and Low Carbon Energy Schemes

Policy DPS3 sets out the Council's support for renewable and low carbon energy projects and sets out criteria for any future wind energy developments to minimise adverse impacts on the environment.

There has been a minor update to this policy to include requirements for biodiversity and landscape mitigation. The Plan area contains several features which are notably sensitive to developments of this nature, including the High Wealds AONB and the South Downs National Park. Therefore, using the precautionary principle, it is still considered there would be minor negative impacts on SA Objectives 7 and 8 due to the nature of such schemes.

Lepus' assessment summary is included below with the relevant edits.

Table B-5: Sustainability performance of Policy DPS3.

| Policy Option DPS3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | 0                        | +                 | -                           | -         | 0                 | 0                          | ++               | 0               | 0                     | 0               |

The promotion of renewable or low carbon technologies, including small community-led schemes incorporated within new development as advocated within Policy DPS3, would help to facilitate a decreased reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of greenhouse gases (GHGs) that are emitted into the atmosphere. This in turn would reduce Mid Sussex’s contribution towards the causes of climate change. This policy would therefore be likely to have a major positive impact on Mid Sussex’s renewable energy resources by seeking opportunities to utilise renewable and low carbon energy sources (SA Objective 11).

Additionally, through ensuring that all proposals submit an End of Life Removal Scheme which includes timeline for decommissioning and restoration, and any biodiversity net gain, the policy will help to ensure the best use of land and support the redevelopment of previously developed land. Therefore, a minor positive impact on natural resources within the Plan area (SA Objective 6) could be expected.

#### B.5.4 DPS4: Flood Risk and Sustainable Drainage

Policy DPS4 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding from a range of sources.

Since the Regulation 18 Plan, this policy has been expanded to reflect national planning policy guidance. No alternatives were considered as the update was required following major Planning Practice Guidance changes.

The policy states: "Proposals for development will need to follow a sequential risk-based approach directing development away from areas at highest risk (whether existing or future risk), ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. All development should consider flood risk in line with national guidance at the time of assessment, including the need to consider and assess flood risk from all sources consistently".

The policy now seeks to ensure that new development makes suitable drainage provisions, and that no development is approved on any land within the functional floodplain. The policy wording has been strengthened to direct development away from areas of flood risk and make clear the requirement for sustainable drainage measures in new development. Otherwise, Lepus' assessment outcome from the SA Regulation 18 SA remains unchanged and is included below.

Table B-6: Sustainability assessment of Policy DPS4.

| Policy Option DPS4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | ++                       | 0                 | +                           | +         | 0                 | 0                          | 0                | +               | 0                     | 0               |

The policy in the Regulation 18 Plan required SuDS in developments of over ten dwellings (or equivalent mixed use); however, the policy update now requires the implementation of SuDS in all new developments, including replacement structures and brownfield development. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on reducing flood risk would still be anticipated (SA Objective 5).

The policy now states "Green infrastructure will be incorporated, where possible, to improve biodiversity and water quality", which will further reinforce the minor positive impact the policy will have on biodiversity (SA Objectives 7).

The policy's wording remains the same in relation to landscape and water resources (SA Objective 8 and 12) and the policy will have a neutral impact on the other SA Objectives, as

assessed in the Regulation 18 SA.

### B.5.5 DPS5: Water Neutrality

All of Horsham District, most of Crawley Borough, and parts of Chichester District and the South Downs National Park fall within the Southern Water Sussex North Water Resource Zone (WRZ). A small part of Mid Sussex is within this WRZ. Therefore, to protect the nature conservation sites and to provide the necessary certainty that development will not have an adverse effect on the Arun Valley sites, development within the WRZ must demonstrate that it is water neutral.

Policy DPS5 requires all development to be designed to achieve water efficiency standards, as well as offsetting the demand for water against existing supplies.

Two options have been considered for this policy. These were:

1. Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone).
2. Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C (CBC, 2023).

This policy has been added to the District Plan since the Regulation 18 Plan, and so was not assessed as part of the previous SA. An assessment of this policy and its alternatives is presented below.

| Policy Option DPS5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |
| 2                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | ++              | 0                     | 0               |

It is considered that both Options would have a negligible impact on most SA Objectives.

Sussex North WRZ is supplied from groundwater abstraction on the river Arun, close to Pulborough in Horsham district. The abstraction site is located close to a group of nature



conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as SAC, SPA and Ramsar. The Options perform well against the biodiversity objective as it protects these sites from harm as a result of development (SA Objective 7).

Options 1 and 2 will both provide benefits for the local water resources through promoting the sustainable use of water and ensuring that all development incorporates a sustainable water efficient design. However, Option 1 requires 110 mains litres of mains supplied water per person per day whereas Option 2 goes further by setting a more ambitious water efficiency target of 85 mains litres of mains supplied water per person per day. Therefore, although both options perform well against the water resource objective, Option 2 would deliver a greater positive impact (SA Objective 11).

Option 2 was therefore chosen as it requires lower levels of water supply offsetting over the plan period, than Option 1, and would help deliver more housing in the district.

### B.5.6 DPS6: Health and Wellbeing

Policy DPS6 aims to help the Council plan for future needs of the evolving population, including provisions for reducing health inequalities and crime, improving access to education and employment, and incorporating GI into all new development.

There has been a minor wording update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-7: Sustainability performance of Policy DPS6.

| Policy Option DPS6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | ++                   | +         | ++                  | +                        | 0                 | +                           | +         | 0                 | +                          | 0                | 0               | +                     | +               |

This policy requires a Health Impact Assessment (HIA) to be carried out for all major residential and commercial developments, as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended. This would be likely to ensure potential adverse effects of development on human health and health inequalities are considered and addressed. By promoting a high quality and attractive public

realm, this policy would also be expected to encourage physical exercise through active travel, which would benefit physical and mental health, as well as encouraging access to outdoor space and increasing social interaction. The increased provision of open space and GI, as well as a focus on tackling noise and air quality issues, would also be expected to improve human health. Overall, a major positive impact on current and future residents' health and wellbeing can be expected (SA Objective 2).

The policy states that all new development *“must be designed to achieve healthy, inclusive and safe places by embedding the principles of the 20-minute neighbourhood and 'local living'”*. Additionally, development proposals should take opportunities *“to increase community connectivity and social inclusion”*, and the policy supports development of new community services such as allotments and public spaces. Therefore, the policy could lead to better social cohesion within the Plan area through inclusive and community-centred design. A major positive impact on community and crime within communities is expected from this policy (SA Objective 4).

Through seeking to ensure that development proposals *“incorporate green and blue infrastructure and biodiversity enhancements”* into the plans, the policy could result in positive impacts on flood risk and biodiversity. Enhanced GI and vegetation coverage would allow for slower water infiltration and runoff, as well as promoting or conserving habitats for wildlife. Policy DPS6 also seeks to ensure developments *“incorporate measures to provide resilience against the effects of climate change including ... flood risk”*. Therefore, a minor positive impact on flooding and biodiversity could result (SA Objectives 5 and 7).

Furthermore, through incorporating enhancements to GI and public open spaces, and delivering high quality well-designed neighbourhoods, the policy could potentially result in a minor positive impact on the character and quality of, and accessibility to, the local landscape (SA Objective 8).

Policy DPS6 seeks to ensure that development proposals prioritise *“active travel such as walking and cycling and sustainable transport such as public transport”*, and therefore through striving to reduce reliance on private vehicles within the Plan area and subsequent GHG emissions, a minor positive impact on climate change and transport (SA Objective 10) could be expected. Additionally, through increasing active travel provisions, accessibility across the Plan area to essential services including employment opportunities and education could be improved. Therefore, a minor positive impact on education, economic regeneration and economic growth could be expected (SA Objectives 3, 13 and 14).

## **B.6 Natural Environment and Green Infrastructure**

### **B.6.1 DPN1: Biodiversity, Geodiversity and Nature Recovery**

No alternatives were considered for this policy. However, Policy DPN1 has been updated since the District Plan to include references to nature recovery strategies, as well as to reflect best practice, required under legislation.

Since the Regulation 18 Plan, the policy wording has been strengthened around protecting biodiversity in all developments and incorporating biodiversity into new developments. The impact on the SA biodiversity objective remains a major positive and Lepus' Regulation 18 SA assessment is unchanged. Lepus' full assessment summary is included below.

Table B-8: Sustainability performance of Policy DPN1.

| Policy Option DPN1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | +                        | +                 | ++                          | +         | 0                 | +                          | 0                | +               | 0                     | 0               |

Nationally and locally designated biodiversity assets within Mid Sussex include numerous SSSIs and LWSs, and many non-designated biodiversity assets such as priority habitats, hedgerows, and veteran trees. Additionally, Ashdown Forest SPA and SAC is located to the north east of the district boundary. Together, these biodiversity and geodiversity assets form a complex ecological network which supports a wide range of flora and fauna. Policy DPN1 would be expected to support development proposals which safeguard biodiversity and geodiversity assets within the Plan area and meet the outlined criteria within the policy, including 'last resort' mitigation and compensation measures in line with the mitigation hierarchy. Additionally, through implementation of this policy and Policy DPN2, development proposals will also need to be in accordance with relevant biodiversity net gain standards and guidelines. Achieving biodiversity net gain is a requirement that relies on long term, effective and well-funded strategies. It is anticipated that this policy would have a major positive impact on biodiversity and geodiversity (SA Objective 7) within the Plan area.

The protection of biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy would therefore be likely to have minor positive impacts on human health (SA Objective 2), through encouraging habitat restoration and incorporating biodiversity features within developments and supporting GI initiatives.

Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the

protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

Furthermore, in regard to natural resources (SA Objective 6), the policy also seeks to minimise adverse impacts on soils including BMV agricultural land resulting from development.

Policy DPN1 supports development proposals which avoids damage to, protects and enhances the special characteristics of nationally protected areas, such as the High Weald AONB. Additionally, by protecting and enhancing biodiversity assets, it would be likely that some key landscape features would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objective 8).

### B.6.2 DPN2: Biodiversity Net Gain

Policy DPN2 supports developments which “*demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately*” and proposals which demonstrate adherence to the mitigation hierarchy in relation to firstly protecting biodiversity of the site in question rather than off-site or compensatory gains.

Three reasonable alternatives were considered for this policy. These were:

1. No Policy - rely on legislation and national policy and guidance.
2. Local policy reflects to meet national requirement and add a local perspective.
3. Have a policy that goes beyond national requirement.

The assessment of these alternatives against the SA Objectives are in Table B-9 below.

Table B-9: Sustainability performance of reasonable alternatives for Policy DPN2.

| Policy Option DPN2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | +                    | 0         | 0                   | +                        | +                 | +                           | 0         | 0                 | +                          | 0                | +               | 0                     | 0               |

| Policy Option DPN2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 2                  | 0            | +                    | 0         | 0                   | +                        | +                 | ++                          | 0         | 0                 | +                          | 0                | +               | 0                     | 0               |
| 3                  | 0            | +                    | 0         | 0                   | +                        | +                 | ++                          | 0         | 0                 | +                          | 0                | +               | 0                     | 0               |

Biodiversity net gain is an approach to development where a site’s biodiversity is left in a better state than it was originally and is currently required at a 10% threshold as specified within the recently enacted Environment Act 2021, which is expected to become law from January 2024. However, Mid Sussex requires a 20% net gain for Significant Sites allocation in the Plan policies DPSC1 - DPSC3.

It is considered that all options would perform similarly against the SA Objectives. Although Option 1 would provide less biodiversity benefit than Options 2 and 3 as it does not enforce additional BNG requirements for Significant Sites within the District.

Option 2 was brought forward to specify this additional BNG requirement, with all other sites complying with national policy. Option 3 was not brought forward as it is unlikely that the Council would be able to impose a 20% BNG across all sites.

There were minor wording changes to this policy since the Regulation 18 Plan. It is considered that Lepus' Regulation 18 SA assessment of Option 2 remains unchanged, and the full assessment summary is included below.

Policy DPN2 will likely enhance biodiversity through provision of *“features to encourage biodiversity and pollination within and around the development”*. The policy also seeks to maximise opportunities for biodiversity net gains associated with Biodiversity Opportunity Areas and in accordance with the Local Nature Recovery Strategy, helping to create more abundant and resilient GI and ecological networks. Policy DPN2 also seeks to ensure that ‘significant sites’ within the MSDPR, outlined in Policies DPSC1-7, will provide for a 20% biodiversity net gain. Therefore, through these provisions, Policy DPN2 could be expected to have a major positive impact on biodiversity (SA Objective 7).

By potentially improving the quality of natural surroundings through biodiversity net gain within the Plan area, including access to, and views of, nature, Policy DPN2 could have a minor positive impact on site end user’s physical and mental health (SA Objective 2).

Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by biodiversity net gain requirements as outlined within Policy DPN2 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore, this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

### B.6.3 DPN3: Green and Blue Infrastructure

Policy DPN3 aims to ensure the provision and safeguarding of Green Infrastructure (GI) and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. This policy was assessed as part of the Adopted Plan, however, was not included as part of the Adopted Plan. It is now considered that green and blue infrastructure is an important delivery mechanism for sustainable infrastructure.

Since the Regulation 18 Plan, there have been minor updates to this policy which includes reference to Blue Infrastructure. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below and in Table B-10.

Policy DPN3 aims to ensure the provision and safeguarding of GI and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. The policy would be likely to provide additional habitats and improve connectivity for flora and fauna, including potential for ecological corridors and steppingstone habitats which provide opportunities for the movement of species and adaptation to climate change. Therefore, this policy would be expected to have a minor positive impact on biodiversity (SA Objective 7).

This policy would be likely to have a positive impact on residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. Additionally, the policy seeks to ensure that developments provide GI which may include integrated green space, providing mixed use environments for site end users, which could potentially provide space for socialisation and community cohesion. A minor positive impact on human health (SA Objective 2) and community and crime (SA Objective 4) can therefore be expected.

Increased GI provision and connectivity would be expected to contribute towards improving air quality due to the increased uptake of CO<sub>2</sub> and filtration of pollutants, including those associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Due to this enhanced carbon storage capacity, this policy could potentially help to reduce exposure of human and ecological receptors to transport related GHG emissions within the Plan area and would therefore be expected to have a minor positive impact on climate change and transport (SA Objective 10).

The incorporation of GI into development would be likely to help reduce water runoff rates, and as such, reduce the risk of both fluvial and pluvial flooding. GI provision, including blue infrastructure, will also potentially improve water quality of local watercourses and enhance natural storage and flow functions. A minor positive impact on flooding (SA Objective 5) and water resources (SA Objective 12) would therefore be expected.

The provision, maintenance and improvement of GI networks would be likely to provide the opportunities to retain and improve the character and appearance of the local landscape and townscape. Additionally, Policy DPN3 states that “*Applicants will need to consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features*”. Therefore, a minor positive impact on landscape can be expected from this policy (SA Objective 8).

Three reasonable alternatives were considered for this policy and were assessed as part of the Adopted Plan. These were:

1. Have a policy that contributes to the establishment of GI and supports development of connected network of multi-functional green space.
2. As option 1, but safeguards land around Burgess Hill for delivery of multi-functional 'Green Circle'.
3. To not have a policy and rely on national policy and guidance.

The assessment of these alternatives against the SA Objectives are in Table B-10 below. The assessment undertaken to inform the adopted plan was against the previous SA framework. These findings have been adapted to fit the current SA framework for consistency.

Table B-10: Sustainability performance of the reasonable alternatives for Policy DPN3.

| Policy Option   | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|   | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|   | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| DPN3  | 0            | +                    | 0         | +                   | +                        | 0                 | +                           | +         | 0                 | +                          | 0                | +               | 0                     | 0               |
| <b>Alternatives (adapted from Adopted Plan SA assessment)</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| 1   | +/-          | +                    | 0         | 0                   | +                        | 0                 | ++                          | ++        | +/-               | +/-                        | 0                | +               | 0                     | 0               |
| 2   | +/-          | ++                   | 0         | 0                   | +                        | 0                 | ++                          | ++        | +/-               | +/-                        | 0                | +               | 0                     | 0               |

| Policy Option   | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|   | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|   | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 3   | 0            | +/-                  | 0         | 0                   | +/-                      | 0                 | +/-                         | +/-       | 0                 | 0                          | 0                | +/-             | 0                     | 0               |
| <b>Further assessment of Option 2 in the short, medium, and long term</b> |              |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
| Short   | +/-          | +                    | 0         | 0                   | +/-                      | 0                 | +                           | +         | +/-               | +/-                        | 0                | +               | 0                     | 0               |
| Med   | +/-          | ++                   | 0         | 0                   | +                        | 0                 | ++                          | ++        | +/-               | +/-                        | 0                | +               | 0                     | 0               |
| Long  | +/-          | ++                   | 0         | 0                   | +                        | 0                 | ++                          | ++        | +/-               | +/-                        | 0                | +               | 0                     | 0               |

It was determined as part of the Adopted Plan SA assessment that Option 1 would address the causes of climate change and would likely reduce road congestion, however there was uncertainty around this. Option 1 would have a major positive impact on conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8), as the policy promotes the establishment of GI and its associated functions. GI would have a minor positive impact on flood risk management (SA Objective 5). Option 2 would also promote positive benefits for biodiversity, landscape, and flooding, and would have a major positive impact on health and wellbeing (SA Objective 2) as it safeguards land for informal open space.

Overall, Option 2 would likely result in positive impacts for the SA Objectives, particularly the Environmental Objectives (SA Objectives 5-12). These positive benefits would increase over the longer term with the strongest impacts seen through the conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8).

It was concluded that Option 3 would not perform as well against these objectives as relying on national policy and guidance would not go far enough in terms of protecting, improving, enhancing, managing, and restoring a connected network of multi-functional greenspace and the associated GI.

#### B.6.4 DPN4: Trees, Woodland and Hedgerows

Mid Sussex has a large abundance of woodland, with two thirds of the district's woodland resources occupied by areas of ancient woodland, with particularly large stands of ancient woodland located in the north west of the district. Trees, woodland and hedgerows form a



main component of the district’s GI and have important biodiversity and human health benefits, as well as helping to increase resilience against climate change such as through removing carbon dioxide from the air, carbon storage and flood alleviation. By aiming to protect and enhance the abundance of trees, woodland and hedgerows within the Plan area from development related pressures, Policy DPN4 would be likely to protect and improve existing habitats for wildlife and ecological networks.

Minor wording updates have been made to this policy since the Regulation 18 Plan to offer additional protection to the district's ancient woodland; to avoid fragmentation of these habitats; and to establish tree related considerations in relation to new development.

Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-11: Sustainability performance of Policy DPN4.

| Policy Option DPN4          | SA Objective |   |   |   |   |   |    |   |   |    |    |    |    |    |
|-----------------------------|--------------|---|---|---|---|---|----|---|---|----|----|----|----|----|
|                             | 1            | 2 | 3 | 4 | 5 | 6 | 7  | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     | -            | + | 0 | 0 | + | + | ++ | + | + | +  | 0  | +  | 0  | 0  |
| Health and Wellbeing        |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Education                   |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Community and Crime         |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Natural Resources           |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Landscape                   |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Cultural Heritage           |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Climate change & transport  |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Energy and Waste            |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Water Resources             |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Economic regeneration       |              |   |   |   |   |   |    |   |   |    |    |    |    |    |
| Economic growth             |              |   |   |   |   |   |    |   |   |    |    |    |    |    |

This policy supports proposals where developers secure “appropriate long-term management arrangements” of these ecological assets and provides exemptions where, as a last resort, developers must compensate for any ecological assets lost. Therefore, a major positive impact on local biodiversity (SA Objective 7) can be expected.

The policy restricts development on areas which are currently occupied by woodland and seeks to locate development “as far as possible from ancient woodland”, which may reduce the number of potential sites, and their yield, within the district. Therefore, a minor negative impact on housing provision (SA Objective 1) could be expected from this policy.

Policy DPN4 supports “the protection and enhancement of trees, woodland and hedgerows” and encourages the planting of new trees. By protecting and enhancing these natural assets which currently make up a large proportion of the district’s area and therefore contribute towards the experience of residential life within the district, the policy would likely enhance residents’ access to, and views of, a diverse range of habitats and potentially lead

to improvements in mental and physical health. Policy DPN4 therefore is expected to have a minor positive impact on health and wellbeing within the Plan area (SA Objective 2).

Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction, filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses. The potential protection and enhancement of biodiversity features as outlined within Policy DPN4 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

Policy DPN4 will not support development that *“will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance”*, such as the High Weald AONB. By protecting and enhancing biodiversity assets, it would be likely that the character and/or setting of some key landscape features, and cultural heritage features, would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objectives 8 and 9).

#### B.6.5 DPN5: Historic Parks and Gardens

Policy DPN5 outlines that development which is located within or adjacent to a historic park or garden will be permitted only where it *“protects and enhances its special features, setting and views into and out of the park or garden”*.

There has been a minor update to this policy since the Regulation 18 Plan with the addition of the following text: *“Buildings or structures within a registered park or garden, or park or garden of special local historic interest will also be protected where they form part of or contribute to the character, appearance and setting of a registered park or garden, or park or garden of special local historic interest”*.

It is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-12: Sustainability performance of Policy DPN5.

| Policy Option DPN5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |

This policy would be expected to help ensure that “*the character, appearance and setting of historic parks and gardens, or park or garden of special local historic interest*” within the Plan area are protected from development related threats and pressures. Therefore, this policy would be expected to have minor positive impacts on cultural heritage within Mid Sussex (SA Objective 9). Additionally, through protecting these parks and gardens, which would likely have some biodiversity and landscape value, a minor positive impact on local biodiversity and landscape settings would be expected (SA Objectives 7 and 8).

#### B.6.6 DPN6: Pollution

Policy DPN6 states that development proposals within the Plan area which are likely to lead to various pollution impacts and hazards will not be supported, and that mitigation measures must be undertaken for development proposals likely to lead to air, noise, vibration, light, water, soil, odour, dust, or any other pollutants. There have been minor wording updates to this policy to include the provision of pollution prevention practices and to include matters related to the water environment. The policy requirements of DPS5: Water and Wastewater Infrastructure from the Regulation 18 Plan have been split between Policy DPN6 and a new policy DPI7, which encompasses criteria on water and wastewater infrastructure. The sustainability credentials of the policy remain unchanged.

No alternatives are considered as this was a general update of DP29 which has now been split into three policies, and the update was required under changes in national guidance.

Lepus’ Regulation 18 SA assessment remains unchanged, and Lepus’ full assessment summary is included below.

Table B-13: Sustainability performance of Policy DPN6.

| Policy Option DPN6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |

The policy refers to adherence to other related policies within the Plan and requires that all development proposals should consider the Council’s published guidance on the topic of avoiding and mitigating pollution.

Through seeking to ensure that development proposals adhere to pollution guidance and regulations, Policy DPN6 is likely to have many benefits relating to human health and the protection of natural resources, wildlife, and watercourses. A minor positive impact on SA Objectives 2, 6, 7 and 12 is therefore expected from this policy.

#### B.6.7 DPN7: Noise Impacts

Policy DPN7 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any noise impacts, including being of “*good acoustic design*”.

There have been minor wording updates to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below.

Table B-14: Sustainability performance of Policy DPN7.

| Policy Option DPN7 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |

Mid Sussex is a largely rural district where high standards of amenity and tranquillity are a key part of life for residents. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of noise pollution. This would be expected to have benefits on mental health and wellbeing of residents, and therefore have a minor positive impact on SA Objective 2.

By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to noise. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).

Policy DPN7 seeks to protect areas that are “valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting”, such as the High Weald AONB. The policy therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

#### B.6.8 DPN8: Light Impacts and Dark Skies

Policy DPN8 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any light pollution impacts, where development proposals are required to ensure that “the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character”.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-15: Sustainability performance of Policy DPN8.

| Policy Option DPN8 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |

The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of illumination. This would help ensure day to day life is not impacted (for example local residents’ sleep routine) and will be expected to have benefits on mental health and wellbeing of residents, and therefore result in a minor positive impact on SA Objective 2.

By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to light pollution, such as nocturnal species. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).

Policy DPN8 seeks to protect intrinsically dark landscapes, including areas within the High Weald AONB. Additionally, the policy supports illuminations of landmarks or heritage features, where the level and type of illumination enhances these features. Policy DPN8 therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

### B.6.9 DPN9: Air Quality

Air pollution is a significant international and local concern. Policy DPN9 seeks to ensure that development proposals specified within the policy, including those “*within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality*”, would not result in a significant increase in air pollution.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-16: Sustainability performance of Policy DPN9.

| Policy Option DPN9 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |

The policy sets out criteria for development proposals to meet, including mitigation measures, to be supported by the Plan. Policy DPN9 would be likely to help prevent significant reductions in air quality across the Plan area, and as such, have a minor positive impact on the health and wellbeing (SA Objective 2) of future and current residents through ensuring residents are not exposed to unacceptable levels of air pollution, and supporting GI proposals.

Some habitats, including Ashdown Forest SPA and SAC situated in close proximity to Mid Sussex District, are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to reduce the rate of air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. The policy also encourages the use of GI to reduce airborne pollution concentrations, which may further benefit sensitive biodiversity receptors in the area. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying Habitats Regulations Assessment (HRA). Overall, this policy would likely have a negligible impact on sensitive habitats through seeking to mitigate potential air quality impacts rather than aiming to improve air quality within the district (SA Objective 7).

Additionally, by supporting sustainable travel and other measures to manage air quality within the Plan area, Policy DPN9 will likely contribute towards reduced levels of transport related GHGs and may therefore have a minor positive impact on climate change and transport (SA Objective 10).

#### B.6.10 DPN10: Land Stability and Contaminated Land

Policy DPN10 seeks to protect land stability and land quality by ensuring all development proposals taken ground conditions, and stability and contamination risks in to consideration.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-17: Sustainability performance of Policy DPN10.

| Policy Option DPN10 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | 0         | 0                 | 0                          | 0                | +               | 0                     | 0               |

Contaminated land could lead to adverse biodiversity and human health impacts through the spread of toxins once 'locked' within the ground. Additionally, development on unstable land could lead to erosion of material, polluting nearby watercourses and has the potential to damage infrastructure and adversely affect human health. This policy aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This would be likely to have a minor positive impact on human health, biodiversity and water resources (SA Objectives 2, 7 and 12).

Additionally, the use of remediated contaminated land for development could potentially help prevent development on previously undeveloped land (for example, greenfield land), and therefore, this policy could potentially help prevent the loss of ecologically or agriculturally valuable soil resources and encourage efficient use of land. This would be expected to have a minor positive impact on natural resources (SA Objective 6).

## B.7 Countryside

### B.7.1 DPC1: Protection and Enhancement of the Countryside

Policy DPC1 seeks to protect and enhance the countryside, defined as the area outside of Built-up Area Boundaries (BUABs), and supports development in the countryside providing it *"maintains or where possible enhances the quality of the rural and landscape character of the District"*.

There have been minor wording updates to this policy to, which includes the provision of additional assessments and mineral policy considerations. Lepus' Regulation 18 SA



assessment remains unchanged though, and Lepus' full assessment summary is included below.

Table B-18: Sustainability performance of Policy DPC1.

| Policy Option DPC1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | +                 | +                           | +         | +                 | 0                          | 0                | 0               | 0                     | 0               |

Large areas of Mid Sussex coincide with the South Downs National Park or the High Weald AONB. Outside of these designations, the district remains largely rural with areas of open countryside separating the settlements. This policy would be expected to limit urbanisation of the countryside and help to prevent coalescence of settlements, maintaining their distinct characters and landscape settings and which could also indirectly protect the settings of heritage assets located within these areas. Therefore, a minor positive impact on local landscape and cultural heritage settings could be expected (SA Objectives 8 and 9).

The policy seeks to protect best and most versatile land (Grades 1, 2 and 3a) from non-agricultural related development, and where this development is deemed necessary, field surveys are required and the lowest quality land within the site should be used. Additionally, Policy DPC1 states that “*economically viable mineral reserves within the district*” are to be protected from unnecessary sterilisation. Therefore, a minor positive impact on natural resources can be expected from this policy (SA Objective 6).

Through protecting and enhancing countryside features, the policy will likely have a minor positive impact on health and wellbeing (SA Objective 2) and biodiversity (SA Objective 7), by helping to maintain the open space nature of the countryside and residents’ access to its features and qualities, leading to mental and physical health benefits whilst protecting the habitats within.

### B.7.2 DPC2: Preventing Coalescence

Policy DPC2 aims to ensure that future development would not result in adverse impacts on the existing landscape settings within the Plan area, by not supporting development

proposals which may lead to the coalescence of settlements which would harm their “unique characteristics”.

Since the Regulation 18 Plan, there has been a minor update to this policy. This is an additional sentence which states that *“Development proposals should demonstrate they are landscape-led and informed by evidence such as landscape and visual impact assessments”*. Notwithstanding this update, it is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B- 19: Sustainability performance of Policy DPC2.

| Policy Option DPC2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | +                   | 0                        | +                 | 0                           | ++        | +                 | 0                          | 0                | 0               | 0                     | 0               |

By protecting settlements, largely located within the countryside, within the Plan area from the effects of urbanisation and resulting coalescence, a major positive impact on the protection of the local landscape would be expected (SA Objective 8). Through protecting local landscape settings of rural settlements, a minor positive impact on protecting the settings of cultural heritage assets within these locations could also be expected (SA Objective 9).

The policy seeks to protect the unique characteristics of settlements within the Plan area and will permit development if *“it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements and would not have an unacceptably urbanising effect on the area between settlements”*. Policy DPC2 is likely to protect social cohesion and promote integration of communities; therefore, a minor positive impact on community and crime (SA Objective 4) is expected.

By preventing development which would lead to coalescence, Policy DPC2 could indirectly reduce the quantity of undeveloped land lost to development and therefore could have a minor positive impact on natural resources, including through protecting best and most versatile land, within the Plan area (SA Objective 6).

### B.7.3 DPC3: New Homes in the Countryside

Policy DPC3 sets out criteria for residential development to meet if located within the countryside (outside of defined BUABs).

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-20: Sustainability performance of Policy DPC3.

| Policy Option DPC3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | +                 | 0                          | 0                | 0               | 0                     | +               |

The policy supports proposals where special justification exists and allows for the re-use and adaptation of rural buildings to meet the diverse housing need. This policy could therefore potentially contribute towards a minor positive impact on housing provision (SA Objective 1).

Through permitting *the “re-use and adaptation of rural buildings”* where proposals secure the future of a heritage asset and enhance the landscape setting of the area, the policy could potentially help to rejuvenate old or dilapidated buildings and restore their historic significance. A minor positive impact on the local landscape and cultural heritage assets could be expected (SA Objectives 8 and 9).

Policy DPC3 sets out guidelines for permitting agricultural dwellings and sets out the exceptional circumstances in which they would be supported. This policy would be anticipated to have a minor positive impact by helping to ensure that rural workers are able to live in a location that permits access into their place of work, reducing time spent commuting, and thereby supporting the rural economy (SA Objective 14).

### B.7.4 DPC4: High Weald Area of Outstanding Natural Beauty

The High Weald AONB is an ancient landscape comprised of small and irregular shaped fields, scattered farmsteads and ancient routeways. Policy DPC4 aims to support development proposals that conserve and enhance the historic landscape and historic settlement pattern of this AONB.

There have been minor updates to this policy to include further considerations of the setting of the AONB and related policy documents. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-21: Sustainability performance of Policy DPC4.

| Policy Option DPC4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | -            | 0                    | 0         | +                   | 0                        | 0                 | +                           | ++        | +                 | 0                          | 0                | 0               | 0                     | +               |

This policy would be expected to support development within the High Weald AONB “*where it conserves and enhances landscape and scenic beauty of the area, with reference to...the High Weald AONB Management Plan*”, including landscape features and their setting, applying a landscape-led design approach. Additionally, development proposals located within the AONB should be located and designed to ensure there is no significant adverse impact on landscape character and views into and out of the AONB. This policy would be likely to help protect the distinctiveness of the nationally important landscape of the AONB for future generations, and therefore, major positive impacts on the landscape character of the High Weald AONB would be expected (SA Objective 8).

The protection afforded to the AONB under this policy would be anticipated to have a minor positive impact on cultural heritage (SA Objective 9), by helping to provide protection to the character and setting of locally and nationally important heritage assets within the AONB.

This policy would support development within the High Weald AONB which “*support the land-based economy and social well-being of local communities within the AONB*”, whilst being compatible with conservation aims, which could lead to minor positive impacts on community cohesion (SA Objective 4) and the local economy (SA Objective 14), through localised developments for community use.

Policy DPC4 seeks to support development which conserves and enhances natural beauty, including the conservation of wildlife. By protecting areas of high biodiversity value, and incorporating measures such as the protection of dark skies within the AONB with likely benefits for nocturnal species, a minor positive impact on biodiversity would be expected (SA Objective 7).

However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the High Weald AONB, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

### B.7.5 DPC5: Setting of the South Downs National Park

Policy DPC5 regards the protection of the visual and special qualities, tranquillity, and essential characteristics of South Downs National Park from development that goes against the criteria identified within the Policy.

Since the Regulation 18 Plan, there has been a minor update to this policy. This change is to ensure no adverse effect on the *"transitional landscape character in the setting of the National Park"*. Lepus' Regulation 18 SA assessment has been updated, as outlined below.

Table B-22: Sustainability performance of Policy DPC5.

| Policy Option DPC5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | -            | 0                    | 0         | +                   | 0                        | 0                 | +                           | ++        | +                 | 0                          | 0                | 0               | 0                     | +               |

The National Park comprises large swathes of primarily open countryside, and therefore this policy would be likely to have a major positive impact on protecting the setting and characteristics of this important landscape (SA Objective 8).

By supporting development which is consistent with the purposes of the South Downs National Park, which includes current aims of increasing land managed for nature from 25% to 33% by 2037, this policy would be likely to contribute towards the protection and enhancement of ecological networks. Special qualities of the park include areas which possess high value biodiversity, and by protecting these assets, a minor positive impact on biodiversity is expected (SA Objective 7).

However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the South Downs National Park, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

### B.7.6 DPC6: Ashdown Forest SPA and SAC

Ashdown Forest SPA and SAC is located on the outskirts of the Mid Sussex District boundary to the north east, within the High Weald AONB. Policy DPC6 aims to protect this designated Habitats site from development related impacts through providing distance thresholds and criteria for development proposals to adhere to, in accordance with the SANG and SAMM schemes (MSDC, 2022a).

There has been no update to this policy, only minor wording additions, and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-23: Sustainability performance of Policy DPC6.

| Policy Option DPC6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | +                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |

This policy sets out that development proposals within 400m of Ashdown Forest SPA and SAC will not be permitted, and development proposals which would lead to a net increase in dwellings within a 7km zone of influence around the designation will be required to contribute to physical and financial mitigation as outlined within the policy. It is expected that this policy would help to protect important biodiversity assets within the designated Habitats site from adverse impacts caused by development. Through protecting the qualifying features of Ashdown Forest, as well as other important biodiversity assets within the area, a minor positive impact on biodiversity and geodiversity (SA Objective 7) would be expected. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying HRA.

Additionally, through aiming to protect Ashdown Forest SPA and SAC within the identified distance thresholds, a minor positive impact on the surrounding landscape, such as the High Weald AONB, could be expected (SA Objective 8).

The protection of these biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats, as provided by

Ashdown Forest, is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. Through protecting this area from development related threats and pressures, current and future residents can continue to enjoy these benefits and therefore the policy would be likely to have a minor positive impact on human health (SA Objective 8).

Development proposals for housing within the identified 7km zone of influence will be required to provide “*Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increases in population; or a financial contribution to a strategic SANG*” as part of the mitigation as set out within the policy. By providing alternative accessible greenspace to Ashdown Forest, Policy DPC6 could potentially result in an indirect minor positive impact on climate change and transport (SA Objective 10) where road traffic and potential congestion around Ashdown Forest is reduced through visitors deciding to use other greenspace instead for recreation.

## **B.8 Built Environment**

### **B.8.1 DPB1: Character and Design**

Policy DPB1 seeks to ensure development designs incorporate various features including open areas to “*animate and provide natural surveillance*”, which would potentially help to discourage crime and reduce the fear of crime within the community. Additionally, the policy seeks to encourage community interaction through supporting proposals with layouts to exhibit a strong neighbourhood focus/centre, with larger (500+ dwellings) residential schemes being expected to incorporate a ‘mixed-use’ element, for example including leisure centres and schools.

This wording of the original policy remains unchanged since the Regulation 18 Plan, although the policy has been updated to consider the 20-minute neighbourhood.

Lepus' Regulation 18 SA assessment remains mostly unchanged, and Lepus' full assessment summary is included below. Notably, economic growth (Objective 14) performs better under the updated policy as it requires major residential and mixed-use proposals to “*exploit opportunities to improve access to local employment, community health and wellbeing facilities, either by connecting to existing facilities or providing new*”.

Table B-24: Sustainability performance of Policy DPB1.

| Policy Option DPB1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | ++                  | +                        | +                 | +                           | +         | +                 | +                          | +                | 0               | 0                     | +               |

Effective design can help to ensure new developments are well integrated into the surrounding landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance quality of life for residents, strengthen sense of place, improve the attractiveness of a location, and create safer places to live and work. Building for Life 12 is a government endorsed design quality indicator for well-designed developments. This guidance should be used by local authorities to help guide design codes within the Plan area. Policy DPB1, alongside the guidance provided within this document, would help to ensure all new development within the Plan period is of high quality and design.

The policy is likely to encourage community cohesion and interaction and promote community-based provisions through well planned design, therefore, a major positive impact on aspects of community and crime within the Plan area is expected (SA Objective 4).

Under this policy, improvements to pedestrian and cycle network and opens spaces would be required, which, in addition to encouraging physical exercise, would be expected to provide alternative sustainable modes of transport and pleasant spaces which could potentially benefit mental wellbeing. An appropriate mix and density of housing would also be expected to have benefits in relation to health and wellbeing, by providing spacious places for people to live. This policy would be likely to make a positive contribution to reducing crime and the fear of crime in the local area. This would be expected to create safe and cohesive communities and help to improve quality of life for residents, and as such, have benefits to the local community. Overall, this would be expected to result in a minor positive impact on health (SA Objective 2).

The policy supports development which “incorporates sustainable construction principles and is designed for adaptation and future weather events”, additionally, proposals which incorporate a GI plan that “*maximises opportunities to retain existing trees and incorporate*



*new trees*” where vegetation would help absorb excess water during flood events. Through encouraging the incorporation of these aspects into future developments, the policy is likely to have a minor positive impact on reducing flood risk (SA Objective 5) within the Plan area. Additionally, the policy may create new habitats and improve connectivity for wildlife through the provisioning of trees and GI, which may have a minor positive impact on biodiversity (SA Objective 7).

Policy DPB1 seeks to *“optimise the potential”* of a site, especially where a site is previously developed, promoting an efficient use of land, which could reduce the amount of best most versatile land lost to development in other areas of the district. Therefore, a minor positive impact on natural resources (SA Objective 6) could be expected.

High quality design would help to ensure that new development does not have an adverse effect on the local landscape. Policy DPB1 seeks to ensure that new development reflects *“the distinctive character of the towns and villages and protects their separate identify, heritage assets and valued townscapes”*, as well as being sensitive to countryside surroundings. Therefore, a minor positive impact on landscape is expected (SA Objective 8). Additionally, through ensuring that future developments reflect the distinctive character of the local surroundings and consider views onto the development, the settings of local heritage assets (such as Listed Buildings) could be conserved or enhanced and therefore a minor positive impact on cultural heritage (SA Objective 9) could result.

The policy sets out that development proposals should be *“organised around green transport principles”* and should *“creates a pedestrian and cyclist - friendly layout that is safe, well connective, legible and accessible”*, whilst being in a location with good public transport links, as well as considering amenity issues such as air pollution. Therefore, the policy is likely to improve access to work and services by public transport, walking or cycling, as well as helping to protect air quality. A minor positive impact on climate change and transport (SA Objective 10) could be expected.

The criteria of high-quality design set out by Policy DPB1 includes the incorporation of *“sustainable construction principles”* into development proposals, which could include use of local materials, recycling or aims of net-zero emissions during the construction phase of development. A minor positive impact on energy and waste (SA Objective 11) could be expected from this aspect of the policy.

### B.8.2 DPB2: Listed Buildings and Other Heritage Assets

The diverse range of heritage assets throughout the Plan area provides a strong sense of place and character to their surroundings. Policy DPB2 requires new development to *“protect listed buildings and their settings”* and *“conserve heritage assets in a manner appropriate to their significance”*, including archaeological, architectural, artistic or historic significance, for the enjoyment of future generations in the district and contribution to residents’ quality of life.

There have been minor wording updates to this policy, which includes additional assessment requirements. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-25: Sustainability performance of Policy DPB2.

| Policy Option DPB2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | ++                | 0                          | 0                | 0               | 0                     | 0               |

This policy sets out criteria for which development proposals should adhere to in regard to protecting historic assets. Therefore, a major positive impact on the historic environment would be anticipated (SA Objective 9).

Through protecting heritage assets within the Plan area, this policy would be likely to have a minor positive impact on the local landscape character (SA Objective 8), for example through the requirement to use traditional construction materials and techniques, which may also help to conserve the setting of high-quality landscapes such as the High Weald AONB.

### B.8.3 DPB3: Conservation Areas

Policy DPB3 seeks to ensure, through various criteria, that development within each of the district's Conservation Areas (CAs) “*preserve or enhance its special character, appearance and the range of activities which contribute to it*” and that development “*will also protect the setting of the conservation area and in particular views into and out of the area*”.

There has been a minor wording update to this policy to include the consideration of trees. Lepus' Regulation 18 SA assessment has been updated as required, as is presented below.

Table B-26: Sustainability performance of Policy DPB3.

| Policy Option DPB3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | ++                | 0                          | 0                | 0               | 0                     | 0               |

There are 36 CAs located within the Mid Sussex District, concentrated in various settlement areas such as East Grinstead, Haywards Heath, and Burgess Hill. Where heritage assets within CAs are conserved and / or enhanced through this policy, a minor positive impact on cultural heritage (SA Objective 9) can be expected.

Through aiming to protect and conserve CAs and their settings, a minor positive impact on the local landscape within the Plan area can be expected, where the special characteristics and qualities of affected landscapes and townscapes will benefit from this policy (SA Objective 8).

#### B.8.4 DPB4: Aerodrome Safeguarding

Policy DPH4 was deleted since the Regulation 18 Plan and Aerodrome Safeguarding Requirements from the policy has been added to this new policy DPB4 with updated text as recommended during the consultation phase.

Two reasonable alternatives were considered for this policy. These were:

1. Add a policy on aerodrome safeguarding.
2. Do not include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003.

The assessment of these alternatives against the SA Objectives are in Table B- 27 below.

Table B- 27: Sustainability performance of reasonable alternatives for Policy DPB4.

| Policy Option DPB4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

Aerodrome Safeguarding and the requirements to consult are set out under Planning Circular 01/2003. Therefore, relying on Planning Circular 01/2003 rather than a specific policy would enable aerodrome safeguarding to be considered. However, recently published evidence (Lichfield, 2018) finds that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, where administrative areas contain an EASA certified aerodrome, a dedicated aerodrome safeguarding policy should be included in Local Plans.

By not including a dedicated policy, the District Plan would not provide the necessary clarity to the planning process. Option 2 would not address the issues necessitating a policy that are discussed under Option 1 and was therefore not supported.

Option 1 has been brought forward to identify the requirements of Aerodrome Safeguarding to support the safe operation of Gatwick Airport and is also considered the most sustainable approach. Including a dedicated aerodrome safeguarding policy will enable the District Plan to make clear that aerodrome safeguarding is a borough-wide requirement that will need to be considered in the planning process. Making applicants aware of this at an early stage will simplify the planning process and ensure that aerodrome safeguarding requirements are planned into development.

Both alternatives would have a neutral impact on all SA Objectives, although it can be considered that the measures would mitigate against attracting birds which could then be susceptible to bird strike.

## B.9 Transport

### B.9.1 DPT1: Placemaking and connectivity

Mid Sussex is a largely rural district where a large proportion of residents currently rely on private vehicles to access community services and facilities. Policy DPT1 seeks to ensure that future development meets the objectives as set out within the emerging West Sussex Transport Plan 2022-2036, by providing relevant criteria for proposals to achieve to attain sustainable transport focused infrastructure within the Plan area.

Two reasonable alternatives were considered for this policy. These were:

1. Simple update to existing policy to address changes to NPPF.
2. Provide granular policies to maximise outcome.

The assessment of these alternatives against the SA Objectives are in Table B-28 below.

Table B-28: Sustainability performance of reasonable alternatives for Policy DPT1.

| Policy Option DPT1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | +               |
| 2                  | 0            | ++                   | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | 0                | 0               | 0                     | +               |

The policy outlines support for implementing sustainable transport options, such as active transport, as a priority before any highway plans are undertaken. By striving to provide residents with well-linked sustainable transport methods as an alternative to private vehicles, a minor positive impact on climate change and transport (SA Objective 10) could result, as vehicle related emissions and pollution could reduce during the Plan period.

Policy DPT1 supports active transport measures where developments are expected to improve walking and cycle routes and links within the Plan area, which would likely have mental and physical health benefits for site end users. Additionally, enhanced active and transport links could improve residents’ access to community facilities, for example shops, libraries and GP services. Therefore, a minor positive impact on health and wellbeing and community, community and crime could result (SA Objectives 2 and 4).

The policy states that new streets within developments “shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre”. This aspect could enhance the home working experience and lead to positive impacts on

economic growth, by increasing the range of employment opportunities within the Plan area, as well as benefitting local businesses with faster internet connectivity. A minor positive impact on economic growth could therefore be expected (SA Objective 14).

Option 1 entails a simple update to reflect changes to the NPPF, however, Option 2 provides further detail to support active travel measures and maximise their benefit, including the creation of 20-minute neighbourhoods. It is therefore considered to be the preferred Option to deliver these benefits.

### B.9.2 DPT2: Rights of Way and Other Recreational Routes

Policy DPT2 seeks to protect existing Public Rights of Way and other recreational routes from development related threats and pressures by ensuring development *“does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes”*. The policy also provides criteria to ensure that development proposals encourage access to the countryside for site end users.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-29: Sustainability performance of Policy DPT2.

| Policy Option DPT2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |

Access to a diverse range of natural habitats is known to have benefits for mental and physical wellbeing and could potentially encourage residents to engage in a more active lifestyle, as well as facilitating better access to the surrounding landscape. By helping to protect these important recreational and active transport assets for future generations, a minor positive impact on human health and wellbeing, landscape and climate change and transport could be expected (SA Objectives 2, 8 and 10).

### B.9.3 DPT3: Active and Sustainable Travel

Policy DPT3 seeks to deliver development with promotes a health environment for residents by embedding the principles of the 20-minute neighbourhood and promoting active travel infrastructure, while also removing any barriers to active and sustainable travel.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex transport plan.
2. Create policy with specific emphasis on active travel for greater emphasis.

The assessment of these alternatives against the SA Objectives are in Table B-30 below.

Table B-30: Sustainability performance of reasonable alternatives for Policy DPT3.

| Policy Option DPT3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | ++                   | 0         | ++                  | 0                        | 0                 | +                           | 0         | 0                 | ++                         | 0                | 0               | 0                     | +               |

Option 1 relies on the active travel guidance in the West Sussex Transport Plan (WSTP) (WSCC, 2022), which provides a broad strategy for extending walking and cycling routes across West Sussex. Through this strategy, a minor positive impact on health and wellbeing, community and climate change and transport could be reached (SA Objectives 2, 4 and 10).

Option 2 was brought forward in order to embed more ambitious active travel measures which go beyond those outlined in the WSTP. Since the Regulation 18 Plan, the policy wording has been updated to embed the principles of the 20-minute neighbourhood, as well as incorporating cycle hubs and supporting the delivery of bus service improvements.

This policy seeks to improve access to active travel facilities by requiring developments to provide “high quality, attractive, fit for purpose and convenient active travel infrastructure, within the development which links to existing networks and key facilities / services” and to build upon various cycling and walking infrastructure schemes.

By ensuring that new developments offer more than just cycle parking but also cycle hubs which include parking e-bike hire, showers and changing facilities, positive impacts on health and wellbeing could result where more people are likely to take up cycling as a form of recreation or active transport. Additionally, by providing cycleways and linking these to the existing cycle network, better access to community facilities could result as well as a reduction of the reliance on private vehicles for transport. Therefore, the policy now performs better against the health and wellbeing, community cohesion, transport, and economic growth objectives as it seeks to improve active travel connections between settlements as well as connect residents to facilities and services (SA Objective 2, 4, 10 and 14).

The policy also now seeks for new active travel infrastructure to connect with existing green networks where possible and incorporate green infrastructure would have a minor positive impact on biodiversity (SA Objective 7), which is an improvement from the neutral impact assessed as part of the Regulation 18 SA.

#### B.9.4 DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy DPT4 seeks to ensure that all new developments provide “adequate and well-integrated car parking”, “accessibility of the site to services and sustainable travel infrastructure” (depending on type, mix and use of the development) and that Electric Vehicle Charging (EVC) points are provided in non-residential developments.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex Transport Plan.
2. Seek higher standards locally.

The assessment of these alternatives against the SA Objectives are in Table B-31 below.

Table B-31: Sustainability performance of reasonable alternatives for Policy DPT4.

| Policy Option DPT4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | ++                         | +                | 0               | 0                     | 0               |



Option 1 requires the policy to rely on guidance within the WSTP which focuses on providing on-street electric vehicle charging infrastructure. This would provide a minor positive impact on climate change and transport by increasing the support for residents with EVs (SA Objective 10).

Option 2 was chosen to be brought forward, which seeks to achieve higher standards locally through measures such as EV charging points within non-residential developments. Since the Regulation 18 Plan, significant wording updates have been made to this policy. The updated assessment is shown in Table B-31 above, and the assessment summary is included below.

In the Regulation 18 Plan, EVC points were to be provided in 5% of parking spaces in a non-residential development with more than 10 parking spaces, and cable routes were to be provided in 50% of the remaining spaces. The policy has been updated to now state that *"a minimum of 25% of all parking spaces with 'Fast' (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 100% of the remaining total number of spaces"* for all non-residential developments. Furthermore, the policy has also been updated since the Regulation 18 Plan to include the Council's support of Car Clubs, of which the vehicles are to be powered by alternative non-fossil fuels which would help achieve energy benefits (Objective 11). This would reduce resident's private car use by providing shared cars for short term hire in public spaces. The policy therefore performs better against the climate change and transport objective and has increased from minor positive to major positive (SA Objective 10) and would change the energy and waste impact from neutral to minor positive. Additionally, Car Clubs can be community organised and therefore would promote community cohesion, providing a minor positive impact on SA Objective 4.

#### B.9.5 DPT5: Off Airport Car Parking

Policy DPT5 aims to resist additional car parking developments at Gatwick Airport, associated with the Northern Runway Project. This was a new policy in the Regulation 18 Plan and two alternatives were considered for this policy. These were:

1. Rely on non-specific West Sussex transport plan / sustainable travel policies.
2. New specific policy.

The assessment of these alternatives against the SA Objectives are in Table B-32 below.

Table B-32: Sustainability performance of reasonable alternatives for Policy DPT5.

| Policy Option DPT5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | 0               |

Option 1 requires the policy to rely on guidance within the WSTP; whereas Option 2 allows the council to specify the most sustainable option for airport parking as set out in Gatwick Airport Limited's published Surface Access Strategy (GAL, 2022).

The policy could potentially help to encourage use of public transport to reach the airport rather than private cars, resulting in a minor positive impact on climate change and transport (SA Objective 10).

## B.10 Economy

### B.10.1 DPE1: Sustainable Economic Development

Policy DPE1 sets out the Council's criteria to achieve sustainable economic development throughout the Plan area in relation to business growth and infrastructure. Through supporting existing businesses and allowing them to expand if required, as well as ensuring infrastructure within the district can provide for future business growth, further employment opportunities could be provided, and economic growth encouraged.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-33: Sustainability performance of Policy DPE1.

| Policy Option DPE1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | +                   | -                        | -                 | -                           | -         | -                 | 0                          | -                | -               | ++                    | ++              |

The policy also seeks to ensure that major development proposals (for example the Sustainable Settlements as identified within the plan, can demonstrate *“how they will contribute to addressing identified local skills shortages and support local employment, skills development and training”*. The policy supports employment for residents and their development of skills through means such as training, which could improve accessibility into the local jobs market. A major positive impact on the economic objectives would therefore be expected through this policy (SA Objectives 13 and 14).

Through supporting business expansion, the policy could allow for smaller community-based businesses to grow and potentially increase residents’ access to community facilities such as pubs, shops, and hairdressers, which may also lead to better community cohesion through use of these businesses. Therefore, a minor positive impact on the community focused objective (SA Objective 4) could be expected.

Policy DPE1 supports the general expansion of businesses which could lead to impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, without further information. The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

#### B.10.2 DPE2: Existing Employment Sites

Policy DPE2 supports the protection and expansion of existing employment areas and provides criteria for these development proposals to meet in order to be supported by the Council. The policy would protect existing employment sites allocated for ‘general industrial’ or ‘storage and distribution’ uses, and proposals which would lead to a loss in these employment areas would be resisted, unless it can be *“clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use”*.

Additionally, the policy supports proposals for intensification within the boundary of Existing Employment Sites, provided it is in accordance with other development plan and national policies.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-34: Sustainability performance of Policy DPE2.

| Policy Option DPE2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | -                        | -                 | -                           | -         | -                 | 0                          | -                | -               | ++                    | ++              |

By protecting these key employment areas from non-employment related redevelopment (for example residential developments), local jobs are protected. Policy DPE2 supports in-principle the expansion of Existing Employment Sites within the identified built up areas, and also supports expansion of Existing Employment Sites outside of built-up areas where certain criteria are met. Overall, major positive impacts can be expected relating to economic regeneration and economic growth through the protection and enhancement of key employment areas (SA Objectives 13 and 14).

Policy DPE2 supports the expansion of Existing Employment Areas, and although proposals are required to meet criteria to help avoid negative impacts, impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, cannot be ruled out without further information.

The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

### B.10.3 DPE3: Employment Allocations

Policy DPE3 sets out the 'Significant Sites' allocated within the draft Plan, and the requirement for these sites to include provision of employment land to help cater for the needs associated with the proposed housing growth, by providing employment and local

business opportunities. Policy DPSC1 relates to Site 740, and DPSC2 relates to Site 18, both of which were assessed alongside reasonable alternatives.

Three reasonable alternatives were considered for this policy. These were:

1. Need approach with no allocations.
2. Opportunity approach which provides mix use development on significant sites to create sustainable communities.
3. Over-supply approach which allocates a site above and beyond Option 1 and 2 (spatial strategy principles).

The assessment of these alternatives against the SA Objectives are in Table B-35 below.

Table B-35: Sustainability performance of reasonable alternatives for Policy DPE3.

| Policy Option DPE3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | +                    | 0         | +                   | 0                        | -                 | -                           | -         | -                 | 0                          | -                | 0               | +                     | +               |
| 3                  | +            | +                    | 0         | +                   | 0                        | -                 | -                           | -         | -                 | 0                          | -                | 0               | +                     | +               |

These alternatives were considered to determine the feasibility of delivery of over-supply approaches.

Option 2 was chosen as the Economic Growth Assessment Update (Lichfields, 2022) identified no outstanding residual employment need due to sufficient supply through planning permissions and allocations already planned for. However, the sustainable settlements allocated in policies DPSC2 and DPSC3 present opportunities for a mix of uses to create sustainable communities.

There have been no updates to this policy and Lepus' Regulation 18 assessment remains unchanged. Lepus' assessment is included in Table B-35 above and the summary is included below.

The proposed employment areas within the Significant Sites referenced in this policy will include retail and commercial opportunities as well as services (as defined within Class E). Mid Sussex is a largely rural district and through providing the local area surrounding these

three sites with greater accessibility to employment opportunities, facilities and services, a minor positive impact on residents' health and wellbeing, access to community and local economic regeneration and growth could be expected (SA Objectives 2, 4, 13 and 14).

The pre-mitigation assessments of the sites have identified potential negative impacts resulting from the development of the employment areas within these sites. These constraints relate to flood risk, natural resources (including mineral safeguarding areas), biodiversity, landscape settings, cultural heritage settings and assets, traffic related emissions, waste production and water resources (including nearby watercourses).

Site-specific requirements provided within the site policies DPSC2 and DPSC3, as referred to within Policy DPE3, would be likely to address some of these adverse impacts, by avoiding development in areas of flood risk and providing multifunctional SUDS, providing active travel and sustainable transport options and mitigating impacts on water resources. A negligible impact would be expected overall for SA Objectives 5, 10 and 12.

A minor negative impact would be likely to remain for biodiversity (SA Objective 7), due to potential for disturbance or degradation of ancient woodland and priority habitat within the sites. Furthermore, the large-scale nature of the sites situated on previously undeveloped land means that despite proposed master planning measures and incorporation of open space, the development is likely to change the landscape character and setting to nearby heritage assets, with a minor negative impact on landscape (SA Objective 8) and cultural heritage (SA Objective 9).

A major negative impact would be likely in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) because of the development, and potential sterilisation of mineral resources within the MSA.

#### B.10.4 DPE4: Town and Village Centre Development

Policy DPE4 sets out the hierarchy of centres within Mid Sussex including town centres and village centres, and proposed 'sequential test', to help ensure that development proposals are of appropriate use and scale depending on the needs and capacity of the area.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-36: Sustainability performance of Policy DPE4.

| Policy Option DPE4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | +               |

This policy aims to support and strengthen the identified hierarchy of centres. This would be expected to provide benefits at the local community scale, in terms of residents’ access to local services and facilities, and well as strengthening the local economy. In addition, this policy would be expected to support and protect key retail areas through ensuring that development proposals of “500m<sup>2</sup> or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area”. Therefore, a minor positive impact on economic regeneration and growth within the Plan area could be expected (SA Objectives 13 and 14).

Through supporting development within a town or village centre, as defined within the table within the policy, residents are more likely to have greater access to facilities and services within their local area. Additionally, by supporting local businesses and the local economy, this policy would be expected to have positive impacts on the health and wellbeing of residents. Therefore, minor positive impacts on SA Objectives 2 and 4 could be expected.

#### B.10.5 DPE5: Within Town and Village Centre Boundaries

Policy DPE5 seeks to support development of main town centre uses, as defined by the NPPF, and covers other forms of development such as temporary ‘meanwhile’ uses and delivery lockers.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below.

Table B-37: Sustainability performance of Policy DPE5.

| Policy Option DPE5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | 0               |

By outlining support for appropriate developments within defined Town and Village Centre Boundaries, the policy would likely improve residents' accessibility to facilities and services which fall within the categories outlined within the policy, and also enhance the viability and vitality of the town centres within the Plan area. Therefore, a minor positive impact on community accessibility and economic regeneration and growth could be expected (SA Objectives 4, 13 and 14).

#### B.10.6 DPE6: Development Within Primary Shopping Areas

Policy DPE6 aims to support development within designated Primary Shopping Areas which would retain and enhance Class E uses (commercial, business and service), as defined within the policy, provided the vitality and viability of the centre is not harmed from such proposed development.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.



Table B-38: Sustainability performance of Policy DPE6.

| Policy Option DPE6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | +         | 0                 | 0                          | 0                | 0               | +                     | 0               |

The policy sets out criteria which development proposals should adhere to for them to be supported, including resisting the loss of Class E uses to alternative non-town centre uses. This policy would likely help to maintain and increase the range of employment opportunities, shops and services available in the town centres across the district and therefore a minor positive impact on economic regeneration is expected (SA Objective 13).

This policy supports residential uses in upper storeys of town centre buildings, and in some specific circumstances the policy supports ground floor residential units. This would likely help to ensure delivery of a range of types, tenures and mix of homes required over the Plan period, and therefore a minor positive impact on housing provision could be expected (SA Objective 1).

Additionally, through responsibly supporting the need of growing communities within town centres, accessibility to services including healthcare and recreation facilities, such as pharmacies and gyms, could be improved. This could result in a positive impact on health and wellbeing and community access (SA Objectives 2 and 4).

The policy also sets out the Council's support for town centre developments where they maintain an attractive and active frontage to the public realm. Through resisting development which would harm the vitality and viability of the centre or the character of the street scene, this policy could potentially result in a minor positive impact on the local landscape character (SA Objective 8).

### B.10.7 DPE7: Smaller Villages and Neighbourhood Centres

Policy DPE7 recognises the important role that Mid Sussex's smaller villages and neighbourhood centres can play in regard to supporting the needs of the local community.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy and Permitted Development Rights.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-39: Sustainability performance of Policy DPE7.

| Policy Option DPE7 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | +               |

Through seeking to protect “*Smaller villages, neighbourhood centres and parades of five or more main town centre uses*”, this policy could potentially help to retain residents’ sustainable access to facilities and services, maintaining the viability and vitality of the smaller centres. Therefore, a minor positive impact on community accessibility, climate change and transport, and economic regeneration and growth could be expected (SA Objectives 4, 10, 13 and 14).

#### B.10.8 DPE8: Sustainable Rural Development and the Rural Economy

Policy DPE8 supports various types of rural development including leisure and tourism related development, farm diversification and the re-use and adaptation of farm buildings for business use or sustainable rural tourism, for example, where the policy provides criteria for development proposals to meet in order to be supported.

There has been no significant update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-40: Sustainability performance of Policy DPE8.

| Policy Option DPE8 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | 0               |

Mid Sussex District is largely rural, and some of the key rural businesses within Mid Sussex include agriculture, horticulture and forestry. In addition, an increasing number of residents in rural areas are home workers. Overall, this policy would be expected to have a minor positive impact on the local economy regeneration and the wellbeing of local residents, by encouraging the provision of rural employment opportunities (SA Objectives 2 and 13). Additionally, by ensuring employment opportunities within the rural areas of Mid Sussex are safeguarded and promoted, this policy could potentially help reduce the need to travel for residents living in these areas, which could result in a minor positive impact on reducing transport related emissions (SA Objective 10).

#### B.10.9 DPE9: Sustainable Tourism and the Visitor Economy

Policy DPE9 aims to promote sustainable tourism and the visitor economy within Mid Sussex through supporting the retainment of existing tourism accommodation as well as development proposals for new tourist accommodation and attractions, in principle, with criteria for such developments to meet to be supported.

There have only been minor wording changes to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-41: Sustainability performance of Policy DPE9.

| Policy Option DPE9 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | +                 | +                          | 0                | 0               | +                     | +               |

This policy would be likely to enhance the tourism potential of Mid Sussex and result in an increase in the number of visitors to the Plan area. Increased tourism would be expected to have benefits in relation to the local economy by potentially providing new cultural activities and promote growth in rural areas, therefore a minor positive impact on economic regeneration and growth could be expected (SA Objectives 13 and 14). Additionally, an increase in employment opportunities and a strong local economy would also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 2).

Through safeguarding heritage features such as the Bluebell Railway Link and railway corridor between Horsted Keynes and Haywards Heath, as well as potentially conserving and promoting other cultural heritage features as tourist attractions through this policy, a minor positive impact on cultural heritage within the Plan area could be expected (SA Objective 9).

The policy sets out the requirement for tourist development to encourage sustainable travel opportunities and to ensure that anticipated traffic generation would not result in “harm on highway safety or severe residual cumulative impacts on the road network”. Therefore, through encouraging sustainable transport there is potential for tourists to use these transport methods rather than private vehicles, and a minor positive impact on climate change and transport could be expected (SA Objective 10).

## B.11 Sustainable Communities

### B.11.1 DPSC GEN: Significant Site Requirements

DPSC GEN is a new policy since the Regulation 18 Plan and incorporates the relevant criteria for Significant Sites from the deleted Policy DPH4.

Table B-42: Sustainability performance of Policy DPSC GEN.

| Policy Option DPSC GEN      | SA Objective |    |   |    |    |   |    |    |    |    |    |    |    |    |
|-----------------------------|--------------|----|---|----|----|---|----|----|----|----|----|----|----|----|
|                             | 1            | 2  | 3 | 4  | 5  | 6 | 7  | 8  | 9  | 10 | 11 | 12 | 13 | 14 |
| Housing                     |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Health and Wellbeing        |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Education                   |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Community and Crime         |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Flooding & Surface Water    |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Natural Resources           |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Biodiversity & Geodiversity |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Landscape                   |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Cultural Heritage           |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Climate change & transport  |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Energy and Waste            |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Water Resources             |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Economic regeneration       |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
| Economic growth             |              |    |   |    |    |   |    |    |    |    |    |    |    |    |
|                             | ++           | ++ | + | ++ | ++ | + | ++ | ++ | ++ | ++ | ++ | ++ | +  | +  |

The policy outlines various requirements for Significant Sites, including the requirement to provide new and/or improved educational facilities. Policy DPSC GEN also states that Significant Sites must provide access to sustainable infrastructure, such as public transport and active transport links (SA Objective 10), in addition to good connectivity between settlements within the Mid Sussex District. These developments must also “submit an *Employment and Skills Plan ... to secure improvements to the skills of local people*”. Therefore, there will likely be benefits on education and the economy through improved access to employment opportunities, facilities and services located within centres throughout the district. A minor positive impact on education (SA Objective 3) and economic regeneration and growth (SA Objectives 13 and 14) could be expected.

Additionally, the policy has a recurring theme of preparedness for the future, with climate change posing various threats regarding flood risk, water resources and human health, for example. The policy seeks to ensure new developments secure a minimum of 20% biodiversity net gain and to “develop a strategy for the long-term management and stewardship of open space and green infrastructure including initiatives for income generation that could be integrated into the scheme”. It is expected that through this policy and the context within, major positive impacts on the following topics could be expected: housing; health and wellbeing; community and crime; flooding; biodiversity; landscape; cultural heritage; climate change and transport; energy and waste and water resources.

**B.11.2 DPSC1: Broad location to the west of Burgess Hill and north of Hurstpierpoint**

Policy DPSC1 relates to Site 740, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a major update to the wording of this policy since the Regulation 18 Plan however the site it relates to remains the same therefore Lepus Consulting's Regulation 18 SA assessment summary is included below with relevant edits.

Table B-43: Sustainability performance of Policy DPSC1.

| Policy Option DPSC1         | SA Objective |   |    |    |   |   |   |   |   |    |    |    |    |    |
|-----------------------------|--------------|---|----|----|---|---|---|---|---|----|----|----|----|----|
|                             | 1            | 2 | 3  | 4  | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Health and Wellbeing        |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Education                   |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Community and Crime         |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Natural Resources           |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Landscape                   |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Cultural Heritage           |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Climate change & transport  |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Energy and Waste            |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Water Resources             |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Economic regeneration       |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
| Economic growth             |              |   |    |    |   |   |   |   |   |    |    |    |    |    |
|                             | ++           | + | ++ | ++ | 0 | - | 0 | - | 0 | 0  | -  | 0  | 0  | ++ |

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including retail, leisure and workspaces, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “central bus route” and “*Green travel corridors for active travel throughout with links to the ‘Green Circle’*”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of 1,350 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site sports pitches, leisure facilities and allotments, as well as financial contributions towards further community facilities, healthcare, and emergency services. The proposed development would also include an element of extra-care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.

However, the A273 passes the site to the east, with potential adverse implications for the health of site end users in the eastern extent. The policy requires the development to provide “green travel corridors” and incorporate links to the ‘Green Circle’ which is located parallel to the A273. With careful design and layout, and maintaining the tree buffer along the A273, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main road. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.

The policy also requires the development of a new primary school on site. The site is also located in an area within sustainable travel times to existing schools. Therefore, the policy would be likely to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 1,350 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The site coincides with 'Northend Copse' ancient woodland, as well as sections of 'Jackson's Pit' and 'Parson's Withes' ancient woodland, with further extents of deciduous woodland priority habitat also within the site boundary. The policy does not make any specific provisions to conserve and enhance these habitats. Although direct loss of the ancient woodland would be resisted in accordance with other District Plan policies, the introduction of 1,350 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation. Through the requirement of a 20% biodiversity net gain as set out in Policy DPSC GEN, a neutral impact on biodiversity is expected (SA Objective 7).

The east of the site is located within ‘West Burgess Hill Low Weald’ which has ‘high’ capacity, according to the Landscape Capacity Study; however, the west of the site is located within ‘Cobb’s Mill Low Weald’ which has ‘low’ capacity. Policy DPSC1 seeks to incorporate “Open space / play space / village green” within the new community, with green links and development informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ impact on nearby listed buildings. The policy requires “*preserves the setting of Grade II Listing Buildings at North End Farm to the west, The Sportsman Inn to the north and Kent’s Farm House to the south of the site*” which would help to inform

appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development.

### B.11.3 DPSC2: Land at Crabbet Park, Cophthorne

Policy DPSC2 relates to Site 18 in this Regulation 19 SA. It related to site 799 at Regulation 18.). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been wording additions to this policy since the Regulation 18 Plan. Relevant to this assess include addressing any issues to the adjacent ancient woodland, protecting the setting of Grade II\* Listed Crabbet Park, the Orangery and Tennis Court and Grade II Listed Pear Tree House, Ley House, Rowfant Mill, Rowfant Mill House and Rushmore Cottage, and retaining and enhancing PROWs which cross the site.

An updated assessment of this policy is included below.

Table B-44: Sustainability performance of Policy DPSC2.

| Policy Option DPSC2         | SA Objective |   |    |    |   |    |   |   |   |    |    |    |    |    |
|-----------------------------|--------------|---|----|----|---|----|---|---|---|----|----|----|----|----|
|                             | 1            | 2 | 3  | 4  | 5 | 6  | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     | ++           | + | ++ | ++ | 0 | -- | - | - | - | 0  | -  | 0  | +  | ++ |
| Health and Wellbeing        |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Education                   |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Community and Crime         |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Natural Resources           |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Landscape                   |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Cultural Heritage           |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Climate change & transport  |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Energy and Waste            |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Water Resources             |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Economic regeneration       |              |   |    |    |   |    |   |   |   |    |    |    |    |    |
| Economic growth             |              |   |    |    |   |    |   |   |   |    |    |    |    |    |

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including community facilities and employment space, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “transport hub” and *“Improved linkages to cycling and walking network to ... Three Bridges train station, Crawley Town Centre and areas of employment”*. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to benefit transport and



accessibility; although, owing to the large scale of proposed development and introduction of 2,300 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site play space, leisure facilities and healthcare, as well as financial contributions towards further community facilities, sports, healthcare and emergency services. The proposed development would also include an element of extra care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.

However, the A220 passes the site to the north, and the M23 to the west, with potential adverse implications for the health of site end users in proximity to these areas. In accordance with other District Plan policies, it is expected that the development would retain the existing tree belts alongside these roads. With careful design and layout, informed by master planning, and maintaining the tree buffers, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main roads. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.

The policy states that the development should deliver an *“All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form”*. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The site coincides with large areas of deciduous woodland priority habitat, as well as several stands of ancient woodland including: 'Drivers Wood', 'Burley's Wood', 'Old Hollow Wood', 'Brewhouse Wood', 'Hotel Wood', 'Layhouse Wood' and 'Compasses Wood'. The policy does not make any specific provisions to conserve and enhance these habitats.

Although direct loss of the ancient woodland would be resisted in accordance with other District Plan policies, the introduction of 2,300 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation, with a minor negative impact on biodiversity overall (SA Objective 7).

The north west of the site is located within 'East Crawley-Copthorne Settled Woodland Matrix' and the south east within 'Rowfant High Weald', both of which have 'low' capacity, according to the Landscape Capacity Study. Policy DPSC3 seeks to ensure "*Mitigation of impact of the development on the AONB which lies to the south of the site*" and ensure development is informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed and potential impacts on the setting of the AONB.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a 'high' adverse impact on nearby listed buildings. This includes the Grade II Listed Building 'Ley House' within the site, and the adjacent 'Rowfant Mill' and 'Pear Tree House, Crabbet Park' as well as the Grade II\* Listed Building 'Crabbet Park'. The policy does not make any specific provisions in relation to these listed buildings, and, although the masterplanning provisions may serve to reduce adverse effects on the historic character of the area to some extent, it is likely that the introduction of 2,300 dwellings would alter the rural setting to several listed buildings. A minor negative impact on cultural heritage would be expected (SA Objective 9).

A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

#### B.11.4 DPSC3: Land to the south of Reeds Lane, Sayers Common

Policy DPSC3 relates to Site 799, which was assessed alongside reasonable alternatives. This policy related to Site 18 at the Regulation 18 stage. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been wording updates to this policy since the Regulation 18 Plan. Primarily in the delivery of the 20-minute neighbourhood through coordinated public transport services and the retention and enhancement of PROWs which cross the site. It is considered that these additions have improved the policy's climate change and transport impact from negligible to minor positive as it should reduce residents reliance on private cars (SA Objective 10).

The development must also provide "*protection of setting of Grade II Listed Wellington Cottage and Grade II Listed North Pottersfield and South Potterfield Cottages*". This would

improve the cultural heritage impact performance from minor negative to negligible (SA Objective 9).

The policy also now acknowledges that the site is within a Mineral Safeguarding Area and that any development should consider the potential for minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a major negative due to the large development of undeveloped land, loss of open countryside and agricultural land.

Regarding the other objectives, the Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' assessment summary for these objectives is included below with relevant edits.

Table B-45: Sustainability performance of Policy DPSC3.

| Policy Option DPSC3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | ++           | +                    | ++        | ++                  | +                        | -                 | 0                           | -         | 0                 | +                          | -                | 0               | +                     | ++              |

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including a neighbourhood centre with community facilities and employment uses, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a new “transport hub” and “Sustainable travel connections to Burgess Hill”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of approximately 2,000 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

The policy seeks to “improve connectivity” which would be expected to include active travel provisions and sets out a range of requirements for community infrastructure including on play space, leisure facilities, healthcare, and community facilities, as well as financial contributions towards further community and sports facilities, healthcare and emergency services. The proposed development would also include an element of extra-care housing and seeks to create a new sustainable community. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and a major positive impact on community (SA Objective 4), through improving the provision of and access to healthcare, recreation, and leisure facilities for the local community.

The policy also states that the development should deliver an “All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form, with early years and potential SEND”. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,000 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

Much of the site is located within ‘Albourne Low Weald’ which has ‘low’ capacity. The site comprises a large area of agricultural / pastoral land situated between Sayers Common and High Cross. Policy DPSC3 states that development should be informed by a comprehensive masterplan and seeks to “ensure there is significant open space and landscaping on the southern boundary to ensure a gap between Sayers Common and Albourne, to maintain the separate identify of these settlements”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.

There are no designated biodiversity sites or priority habitats within the site, although there are some nearby stands of ancient woodland. The provision of “significant open space and landscaping”, alongside requirements set out in other District Plan policies in relation to provision of ecological networks and GI, would help to minimise potential for adverse impacts on biodiversity. The policy could potentially result in a negligible impact on biodiversity (SA Objective 7).

A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) because of the development.

#### B.11.5 DPSC4: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

Policy DPSC4, previously DPH19, relates to site 1026, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to “*avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience*”. This is considered to have a minor positive impact on biodiversity and landscape.

The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. The site is relatively small-scale and enclosed by trees and existing development. Policy DPSC4 previously stated that the proposal should “*Retain, protect and enhance existing mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features*” and it was considered in the Regulation 18 SA that by retaining the trees which surround the site it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8). However, this has been removed from the policy and should trees be lost this would result in a minor negative impact on landscape character.

The retention and enhancement of mature trees and hedgerows could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-46: Sustainability performance of Policy DPSC4.

| Policy Option DPSC4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | +         | +                   | +                        | -                 | +                           | -         | 0                 | +                          | 0                | 0               | 0                     | +               |

#### B.11.6 DPSC5: Land at Coombe Farm, London Road, Sayers Common

Policy DPSC5, previously DPH20, relates to site 601, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education (which had a neutral impact at the Regulation 18 stage), and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity (previously a neutral impact) and landscape (previously a minor negative impact).

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-47: Sustainability performance of Policy DPSC5.

| Policy Option DPSC5 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|---------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                     | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing             | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                     | ++                   | +         | +                   | +                        | +                 | -                           | +         | +                 | 0                          | +                | 0               | 0                     | 0               | +  |

B.11.7 DPSC6: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Policy DPSC6, previously DPH21, relates to site 830, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape, which is a better impact than at the Regulation 18 stage which found a neutral impact.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-48: Sustainability performance of Policy DPSC6.

| Policy Option DPSC6 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|---------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                     | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing             | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                     | ++                   | +         | +                   | +                        | +                 | -                           | +         | +                 | 0                          | +                | -               | 0                     | 0               | +  |

B.11.8 DPSC7: Land at LVS Hassocks, London Road, Sayers Common

Policy DPSC7, previously DPH22, relates to site 1003, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that these perform better than in the Regulation 18 SA and would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to “avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience”. This is considered to have a minor positive impact on biodiversity and landscape, which had a minor negative impact at the Regulation 18 stage.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.



Table B-49: Sustainability performance of Policy DPSC7.

| Policy Option DPSC7 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|---------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                     | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing             | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                     | ++                   | +         | +                   | +                        | +                 | -                           | +         | +                 | 0                          | 0                | -               | 0                     | 0               | +  |

## B.12 Housing

### B.12.1 DPH1: Housing

Policy DPH1 sets out the district's local housing need over the Plan period, against the housing supply identified within the Plan.

A minor update been made to this policy since the Regulation 18 Plan to update the site references and the housing need which will be met by the site allocations.

Two alternatives were considered for this policy. These were:

1. Housing requirement approach: meet the housing requirement calculated for Mid Sussex by allocating the most suitable sites in line with the site selection methodology.
2. High growth approach: identify sites above and beyond the housing requirement.

The assessment of these alternatives against the SA Objectives are in Table B-50 below.

Table B-50: Sustainability performance of reasonable alternatives for Policy DPH1.

| Policy Option DPH1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | +            | +/-                  | 0         | +/-                 | -                        | --                | +/-                         | --        | -                 | -                          | -                | 0               | 0                     | 0               |
| 2                  | ++           | +/-                  | 0         | +/-                 | -                        | --                | +/-                         | --        | -                 | -                          | -                | 0               | 0                     | 0               |

Both Options will have a similar impact on the SA Objectives; however, by surpassing the required housing need, Option 2 would be likely to ensure that there will be sufficient houses to meet the needs of current and future residents, and therefore a major positive impact on housing provision would be expected whereas by meeting the housing supply a minor positive impact is expected for Option 1 (SA Objective 1). Option 1 was brought forward as this was the more realistic Option for the delivery of housing in the district.

Through providing enough houses to meet the required need, the policy may help to facilitate delivery of a range of housing densities and types, offering more market choice, and residents may feel a sense of wellbeing where their needs can be met. However, there is some uncertainty regarding the location of these sites in relation to existing healthcare and community facilities (SA Objectives 2 and 4).

Impacts on biodiversity within the Ashdown SAC and SPA (SA Objective 8) could be expected from the development of the sites associated with this policy. The HRA will provide analysis of the likely impacts, the identification of impact pathways and mitigation measures.

The pre-mitigation assessments of the individual sites which contribute to this housing supply calculation have identified various potential constraints relating to their development, including site end user exposure to surface water flooding; the use of large quantities of undeveloped land for construction; potential for adverse impacts on cultural heritage assets and landscape setting; increased traffic related GHG emissions and increased energy usage. As such, potential major negative impacts have been identified for SA Objectives 6 and 8 and minor negative impacts have been identified for SA Objectives 5, 9, 10 and 11 for the housing provision stated within this policy. These findings are further outlined within Appendix C of this assessment.

### B.12.2 DPH2: Sustainable Development - Outside the Built-Up Area

Policy DPH2 sets out the criteria for supporting small-scale development outside of existing built-up areas where it meets identified local housing, employment and community needs. This policy will help to ensure that development within countryside areas is “demonstrated to be sustainable” and adheres to various other policies within the Plan, such as design specifications.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-51: Sustainability performance of Policy DPH2.

| Policy Option DPH2          | SA Objective |   |   |   |   |   |   |   |   |    |    |    |    |    |
|-----------------------------|--------------|---|---|---|---|---|---|---|---|----|----|----|----|----|
|                             | 1            | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Health and Wellbeing        |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Education                   |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Community and Crime         |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Natural Resources           |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Landscape                   |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Cultural Heritage           |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Climate change & transport  |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Energy and Waste            |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Water Resources             |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Economic regeneration       |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Economic growth             |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
|                             | +            | 0 | 0 | + | 0 | - | 0 | + | 0 | 0  | 0  | 0  | +  | +  |

This policy will be likely to help meet the housing requirement of the whole community, and could lead to a range of type, tenure and mix of homes within the district. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community, as sites must either be within the District Plan, a Neighbourhood Plan or proposals of fewer than 10 dwellings. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through ensuring that sites are “contiguous with an existing built-up area of the settlement”, it may enhance community cohesion, and therefore a minor positive impact on community and crime (SA Objective 4) would be expected.

Through ensuring development proposed for locations outside of built-up areas are guided by Policy DPH2, a minor positive impact on landscape (SA Objective 8) could be expected as proposals for small developments and adherence to design guides which would conserve or enhance the landscape setting would be supported.

By supporting localised developments outside of built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where the developments themselves could provide local work for tradespeople and new residents may

increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

Development outside of built-up areas would likely be located on previously undeveloped land. As such, development proposals under this policy (although of a smaller scale) could potentially result in the loss of soil, to some extent; therefore, a minor negative impact on natural resources could result (SA Objective 6).

### B.12.3 DPH3: Sustainable Development - Inside the Built-Up Area

Policy DPH3 sets out the criteria for supporting development within built-up areas where it which will help to provide appropriate development within existing towns and villages and adheres to various other policies within the Plan, such as design specifications.

There have been wording updates to this policy. However, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-52: Sustainability performance of Policy DPH3.

| Policy Option DPH3 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|--------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                    | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing            |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|                    | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                    | +                    | 0         | 0                   | +                        | 0                 | +                           | 0         | +                 | 0                          | +                | 0               | 0                     | +               | +  |

This policy will be likely to contribute towards meeting the housing requirement of local communities, and could lead to a range of type, tenure and mix of homes within the district due to the requirement to ensure development is of an appropriate scale and nature depending on the settlement in question. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through supporting residential developments within the built-up areas, a greater sense of community cohesion could result, and it is likely that new development would be well located with respect to existing local services, and therefore a minor positive impact on the community and equality (SA Objective 4) would be expected.

Through ensuring development proposed for locations within built-up areas are guided by Policy DPB1 (Character and Design), a minor positive impact on landscape (SA Objective

8) could be expected as developments would be expected to adhere to design guides and would therefore likely conserve or enhance the landscape setting of the surroundings.

Policy DPH3 seeks to support a greater concentration of residential units within areas with *“good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars”*. Therefore, a minor positive impact on climate change and transport (SA Objective 10) could be expected through potentially reducing the level of GHGs emitted from private cars and their subsequent impact on climate change.

By supporting localised developments within built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where construction of the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

Furthermore, through promoting development within existing settlements including infilling and redevelopment, Policy DPH3 could potentially help to encourage an efficient use of land and reduce the need to develop other greenfield locations. A minor positive impact on natural resources could therefore be expected (SA Objective 6).

#### B.12.4 DPH4: Older Persons' Housing and Specialist Accommodation

Policy DPH4 previously concerned General Development Principles for Housing Allocations, which has been deleted since the Regulation 18 Plan and the criteria within the policy has been moved into other relevant policies within the plan.

The new Policy DPH4, previously DPH26, sets criteria for related development proposals and aims to provide adequate accommodation for older residents and those with specialist needs within Mid Sussex.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-53: Sustainability performance of Policy DPH4.

| Policy Option DPH4 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|--------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                    | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing            | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                    | +                    | +         | 0                   | +                        | 0                 | 0                           | 0         | +                 | 0                          | +                | 0               | 0                     | 0               | 0  |

Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. This policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 1).

By providing specialist and supported homes for older residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, result in a minor positive impact on health and wellbeing and communities (SA Objectives 2 and 4).

Additionally, Policy DPH4 seeks to ensure that new development proposals for older persons' housing is *“accessible by foot or public transport to local shops, services community facilities and the wider public network”*. This would help ensure that vulnerable residents would not be cut off from these essential services and will also help to ensure that residents have opportunities choose to use sustainable transport instead of private vehicles, potentially resulting in the reduction of transport related GHG emissions. A minor positive impact on climate change and transport could therefore be expected (SA Objective 10).

This policy states that new proposals should be *“located within or contiguous to the Built-Up Area Boundary”*. Additionally, development proposals for annexes to older persons' housing and special accommodation should respect *“the character and appearance of the host building and local area and is sub-servient to the existing building”*. Through supporting proposals which respect the setting of the local landscape, a minor positive impact could be expected (SA Objective 8).

### B.12.5 DPH5: Gypsies, Travellers and Travelling Showpeople

Policy DPH5, previously DPH29, seeks to ensure a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs.

An alternative to the policy was identified, as outlined below:

1. Address need during the plan period.
2. Allocated site to address surplus need from neighbouring authorities.

Table B-54: Sustainability performance of reasonable alternatives for Policy DPH5.

| Policy Option DPH5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| 2                  | ++           | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

Whilst Option 2 would facilitate allocation of further sites, it is not considered feasible and therefore Option 1 has been taken forward.

The policy is expected to meet the identified pitch targets for Travellers and Travelling Show people which address the likely permanent and transit accommodation needs and as such, have a positive impact on housing (Objective 1). Allocating surplus sites to address need from neighbouring authorities would have a major positive impact on housing.

This policy requires all proposed Gypsy and Traveller sites to meet various criteria including provisions for safe access and within reasonable distance to schools and other facilities. Additionally, development of these sites must be *“appropriately located and designed or capable of being designed to ... ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the residents”*. Therefore, minor positive impacts on site end users’ health and wellbeing and access to community facilities would be expected from this policy (SA Objectives 2 and 4) for both alternative options.

Policy DPH5 seeks to ensure developments of Gypsy and Traveller sites minimise impacts on landscape settings, including the High Weald AONB as per Policy DPC4, and also

requires the proposals to ensure that “Any site within the 7km zone of influence around Ashdown Forest will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required” as per Policy DPC6. Although this policy seeks to mitigate and minimise potential impacts on biodiversity and landscape assets, such as Ashdown Forest SPA and SAC and High Weald AONB, negligible impacts on receptors associated with these themes within the Plan area would be expected (SA Objectives 7 and 8) where the criteria set out within the policy would likely neither wholly protect nor enhance these assets.

### B.12.6 DPH6: Self and Custom Build Housing

Policy DPH6, previously DPH30, relates to self and custom build housing and seeks to ensure a register is maintained of parties interested in building their own home.

There were two alternative policies identified to delivery this:

3. Rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place.
4. Develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations.

Table B-55: Sustainability performance of reasonable alternatives for Policy DPH6.

| Policy Option DPH6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | +            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| 2                  | +            | 0                    | 0         | 0                   | 0                        | 0                 | 0                           | +         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

This policy aims to secure a proportion of residential sites of 100 or more units to be available for self-build housing.

Both options for this policy would be likely to have a positive impact by ensuring that new housing delivered across the Plan area can accommodate the diverse requirements of residents within Mid Sussex, and therefore, have a minor positive impact on housing (SA Objective 1).



By encouraging the development of self and custom build housing, in accordance with local design guides, this policy could help to increase the diversity of buildings within neighbourhoods and provide visual interest. This could potentially result in a minor positive impact on the character of the local landscape and townscape (SA Objective 8).

Option 2 was considered preferable and chosen as the preferred option for the Regulation 19 Plan since it was led by local evidence and didn't rely on other policies and guidance to come forward.

### B.12.7 DPH7: Housing Mix

Policy DPH7, previously DPH31, seeks to “provide a mix of dwelling types and sizes that reflects current and future local housing needs”, including the provision of affordable housing, as well as accommodation for older people (Policy DPH4), people with disabilities (Policy DPH12), build to rent, co-living, and Gypsy and Traveller communities (Policy DPH5).

There has been a minor update to this policy since the Regulation 18 Plan and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-56: Sustainability performance of Policy DPH7.

| Policy Option DPH7 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|--------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                    | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing            |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|                    | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                    | +                    | +         | 0                   | +                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               | 0  |

An appropriate mix of housing is required across the Plan area to help ensure that the varied needs of current and future residents are met. This in particular may include an increased number of smaller homes and affordable homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

This policy would be likely to have a minor positive impact on local housing provision (SA Objective 1). By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, as well as contribute to a vibrant and

varied community, and as such a minor positive impact on health and wellbeing and community is expected (SA Objectives 2 and 4).

### B.12.8 DPH8: Affordable Housing

Policy DPH8, previously DPH32, seeks to ensure that, throughout the Plan area, the MSDPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents, whereby “proposals which do not provide a minimum of 30% affordable housing will be refused” unless there is clear evidence that the requirement is wholly unachievable.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-57: Sustainability performance of Policy DPH8.

| Policy Option DPH8 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

This policy sets out the requirements for provision of affordable housing, including those which are wheelchair accessible, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, the policy would be expected to have a minor positive impact on housing provision (SA Objective 1). Through meeting the identified need of affordable housing, Policy DPH8 will enable residents to purchase more affordable homes within their means potentially resulting in positive impacts on financial wellbeing, with subsequent minor positive health impacts (SA Objective 2).

In seeking to integrate affordable housing into new development, the policy also has the potential to create more inclusive communities by meeting the needs of local people; therefore, a minor positive impact on SA Objective 4 could be expected.

### B.12.9 DPH9: First Homes

Policy DPH9, previously DPH33, seeks to ensure that First Homes are provided as part of the overall residential mix, type and tenure of houses delivered within the Plan period. First Homes, as set out by the policy, will make up 25% of the total number of affordable housing units (as set within Policy DPH32).

There has been a minor update to this policy to include consideration of members and family of the Armed Forces. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-58: Sustainability performance of Policy DPH9.

| Policy Option DPH9 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |    |
|--------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|----|
|                    | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14 |
| Housing            | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |    |
|                    | +                    | +         | 0                   | +                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               | 0  |

This policy sets out the requirements for the development of First Homes and First Home Exception Sites which would be supported by the Council, and therefore by meeting the identified need for first time buyers within the Plan area, a minor positive impact on housing is expected (SA Objective 1). Through meeting the identified need of First Homes, Policy DPH9 will enable residents to purchase more affordable homes within a community of their choice potentially resulting in positive impacts on financial wellbeing and subsequent positive health impacts, as well as helping to create more vibrant and inclusive local communities. A minor positive impact on health and wellbeing and community and equality could therefore be expected (SA Objectives 2 and 4).

### B.12.10DPH10: Rural Exception Sites

Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing. Policy DPH10, previously DPH34, makes provision for these as required under national planning policy.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-59: Sustainability performance of Policy DPH10.

| Policy Option DPH10 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | 0                    | +         | 0                   | 0                        | -                 | 0                           | +         | 0                 | +                          | 0                | 0               | 0                     | 0               |

This policy would be expected to help meet the housing requirements and increase the provision of affordable housing across the Plan area. Therefore, a minor positive impact on housing would be expected (SA Objective 1).

Through Policy DPH10, the development of rural exception sites for affordable housing will only be permitted if certain criteria are met including *“the scale of the development respects the setting, form and character of the settlement and surrounding landscape”* and *“the development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school”*. Therefore, through ensuring landscape settings and accessibility to public transport and local services (potentially including primary schools) are considered, minor positive impacts on education, landscape and climate change and transport could be expected (SA Objectives 3, 8 and 10).

Rural exception sites could potentially be located on previously undeveloped land in the open countryside. As such, development proposals (although of a smaller scale) would be likely to result in the loss of soil resources, and therefore, have a minor negative impact on natural resources (SA Objective 6).

#### B.12.11 DPH11: Dwelling Space Standards

The Nationally Described Space Standards help to ensure that all development satisfies the requirement for internal space ensuring more affordable homes still provide new residents with enough internal space. Policy DPH11 was previously DPH35 in the Regulation 18 Plan.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-60: Sustainability performance of Policy DPH11.

| Policy Option DPH11 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

It is expected that the greater the internal space within a property, the better the standard of living for residents. An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. As such, a minor positive impact on health and wellbeing is expected from this policy (SA Objective 2).

#### B.12.12DPH12: Accessibility

Policy DPH12, previously DPH36, ensures all development meets and maintains a high standard of accessibility for the safe and easy use for all.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-61: Sustainability performance of Policy DPH12.

| Policy Option DPH12 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

Mid Sussex is an area with an increasingly high population of older people, with approximately 21% of the population aged 65 or over in 2021 (ONS, 2021). As such, future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs.

Policy DPH12 would be likely to help ensure residential developments allow for the safe and convenient access for a variety of residents, including older people and wheelchair users. Therefore, this policy would be likely to have a minor positive impact on housing, through meeting requirements of the whole population including older people, and residents' health and wellbeing through such provisions (SA Objectives 1 and 2).

### B.13 Site Allocations

#### B.13.1 DPA1: Batchelors Farm, Keymer Road, Burgess Hill

Policy DPA1, previously DPH5, relates to Site 573, which was assessed alongside reasonable alternatives in pre-mitigation post-mitigation. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-62: Sustainability performance of Policy DPA1.

| Policy Option DPA1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |   |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|---|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |   |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |   |
|                    | +            | +                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               | + |

Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to *“prioritise cycle and pedestrian connections throughout the site with direct links to the Batchelors Farm Nature Reserve to the west”*. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

Policy DPA1 also sets out to *“ensure development provides a positive edge to Batchelors Farm Nature Reserve to the west”* and *“minimise impacts on the most visible parts of the site on the wider countryside and the settings of and any potential views from the South Downs National Park by ensuring that the scale, siting and design of the development avoids harms to this character”*, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. A negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.2 DPA2: Land at South of Appletree Close, Janes Lane, Burgess Hill

Policy DPA2, previously DPH6 relates to Site 1030, which was assessed alongside reasonable alternatives in pre-mitigation (Appendix E) and post-mitigation (Appendix D). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

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Table B-63: Sustainability performance of Policy DPA2.

| Policy Option DPA2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |   |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|---|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |   |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |   |
|                    | ++           | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | 0               | + |

The policy requires financial contributions towards various community facilities and infrastructure, including education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is located on the edge of Burgess Hill, which has a good range of services and public transport options, including a train station. Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to “*prioritise cycle and pedestrian connections throughout the site and onto Janes Lane*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services via walking or cycling, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

The policy seeks to encourage active travel, which may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), which is already assessed positively.

The site is located within ‘Lunce Low Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA2 set out to “*Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development*



*provides a positive edge to these features and the wider countryside*” in the Regulation 18 Plan, which may have helped to reduce adverse effects on the surrounding landscape character. This has been removed and the policy now states *“provide suitable access from Janes Lane which avoids loss of mature trees”*; however, there now could be a minor negative impact overall for landscape (SA Objective 8).

These measures could also help to retain and enhance ecological corridors and habitats. A negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### B.13.3 DPA3: Burgess Hill Station, Burgess Hill

Policy DPA3, previously DPH7, relates to Site 1123, which was assessed alongside reasonable alternatives in pre-mitigation and post-mitigation. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus Consulting's Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-64: Sustainability performance of Policy DPA3.

| Policy Option DPA3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | ++           | ++                   | ++        | ++                  | +                        | +                 | 0                           | +         | 0                 | ++                         | -                | 0               | ++                    | +               |

The policy requires consideration of new children’s equipped play space and allotment space, as well as financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already

assessed positively owing to the site’s location with respect to existing facilities and the effects of other policies.

Policy DPA3 promotes the delivery of an *“attractive and accessible mixed-use development and transport mobility hub, creating a new gateway development to Burgess Hill”* with use of a masterplan. These measures would be likely to improve the local townscape character and strengthen sense of place, leading to a minor positive impact on landscape (SA Objective 8).

The policy also sets out a range of travel improvements, including the requirement to *“Create a mobility hub which prioritises sustainable and active travel links throughout the development establishing a permeable layout”*. The emphasis on sustainable travel links, in combination with the site’s location adjacent to Burgess Hill Station, provides a likelihood of reducing transport related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

#### B.13.4 DPA3a: Allotment Site - Nightingale Lane, Burgess Hill

Policy DPA3a is a new policy since the Regulation 18 Plan and has been included to address the loss of allotments at 0.85ha of land at Chantonbury Road allotments as a result of the DPA3 allocation.

1. Allocate the Burgess Hill Station site with a policy requirement for the reprovision of allotments in line with policy DPI5.
2. Allocate the Burgess Hill Station site and a site for the reprovision of allotments.

Table B-65: Sustainability performance of Policy DPH1.

| Policy Option DPH1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |
| 2                  | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

Option 2 has been chosen and a 1ha site has been allocated at Nightingale Lane which is 0.15ha larger than the Chantonbury Road allotment site that is being lost due to the development. It is considered this policy would have a minor positive impact on health and wellbeing and community and crime by furthering access to outdoor leisure activities and community facilities (SA Objectives 2 and 4).

#### B.13.5 DPA4: Land off West Hoathly Road, East Grinstead

Policy DPA4, previously DPH8, relates to Site 198, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-66: Sustainability performance of Policy DPA4.

| Policy Option DPA4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |   |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|---|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |   |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |   |
|                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | 0               | + |

The policy sets out the requirement for a new parkland and link to Sunnyside Recreation Ground, as well as a “provide appropriate pedestrian crossing from the site to the pavement along West Hoathly Road”, which would be likely to improve accessibility and may encourage active travel for local journeys. Further financial contributions are required in relation to range of community and leisure facilities including sports facilities and play space. These measures would help to improve the provision of and access to community

facilities, and encourage exercise and recreation, with a minor positive impact anticipated on health and wellbeing and the local community (SA Objectives 2 and 4).

The improvements to the local pedestrian network, alongside the proposed “sustainable transport measures” would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Furthermore, the policy requires financial contributions towards education and a Library. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Landscape officer comments provided by the Council during the Regulation 18 stage indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB, due to the loss of a medieval field system and may have adverse impacts on the surrounding settlement pattern. The site is also located within ‘Sunnyside High Weald’ which has ‘negligible / low’ capacity, according to the Landscape Capacity Study. Policy DPA4 requires “*to conserve and enhance the High Weald AONB, taking account of the landscape and natural features of the site and the surrounding settlement*”. Whilst this may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

The site is located adjacent to ‘Rockingshill Wood’ ancient woodland and coincides with deciduous woodland along the south eastern site edge. The policy seeks to ensure that the development provides “*an appropriate buffer for the ancient woodland and Priority habitat (deciduous woodland) within the site and to the east of the site*” and states that hedgerow fronting West Hoathly Road should be retained and enhanced as much as possible. These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. The site also lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A negligible impact on biodiversity (SA Objective 7) would be expected overall.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.6 DPA5: Land at Hurstwood Lane, Haywards Heath

Policy DPA5, previously DPH9, relates to a section of Site 858 (the portion of the site which lies within Mid Sussex District), which was assessed alongside reasonable alternatives in pre-mitigation and post-mitigation. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

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Table B-67: Sustainability performance of Policy DPA5.

| Policy Option DPA5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | 0                | 0               | 0                     | +               |

The policy states that “sustainable transport measures” and improved active travel links should be provided. These measures would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services as well as the site’s location on the periphery of Haywards Heath, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4.

The policy requires financial contributions towards education. The proposed active travel links within Policy DPA5 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan (HHTC, 2016). Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the

development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is near to several stands of ancient woodland, including 'Hursthouse Lane Wood' to the north, and 'Hurst Wood' and 'Cleave Water Wood' to the south, across Colwell Lane. The site also coincides with a small section of deciduous woodland priority habitat, in the south eastern corner. Policy DPA5 sets out the requirement for enhanced GI, to "*Retain and enhance the trees and retain the ground levels along Hurstwood Lane*" and to "*Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the east of the site, including ecological corridors*". These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. A negligible impact on biodiversity (SA Objective 7) would be expected overall.

The site is located within 'Haywards Heath South-eastern Fringe' which has 'low' capacity, according to the Landscape Capacity Study. Further to the provision of an "appropriate transition" into the countryside, the policy states that "Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area, including a landscape buffer on the eastern site boundary". Although there may be a change in the landscape character to some extent due to the proposed development, these measures would be anticipated to reduce adverse impacts on the landscape character, with a negligible impact overall for landscape (SA Objective 8).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.7 DPA6: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

Policy DPA6, previously DPH10, relates to Site 508, which was assessed alongside reasonable alternatives in pre-mitigation and post-mitigation. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy; however, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-68: Sustainability performance of Policy DPA6.

| Policy Option DPA6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | +                     | +               |

The policy outlines required improvements to travel choice, including “sustainable transport measures”. This would be expected to result in a benefit to transport; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

The policy requires financial contributions towards education. The proposed active travel and green infrastructure links within Policy DPA6 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Policy DPA6 states that the development should “*Retain and enhance the trees on the site boundaries to provide a landscape buffer to the wider countryside*” and incorporate GI and ecological corridors. These measures may help to retain and enhance biodiversity assets. A negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Haywards Heath South-eastern Fringe’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA6 seeks to ensure that the development integrates well with the adjacent allocation DPA5 and states that “*Measures*

*will be necessary to mitigate the impact of development on the landscape character of the surrounding area*". The site is relatively small-scale and enclosed by trees, and the policy advocates to *"Retain and enhance the trees on the site boundaries to provide a landscape buffer to the wider countryside"*. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees which surround the site it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.8 DPA7: Land east of Borde Hill Lane Haywards Heath

Policy DPA7, previously DPH11, relates to Site 556. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

The policy also now states *"avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience"*. In the Regulation 18 SA post-mitigation assessment the policy had a neutral impact on flooding, improved from a pre-mitigation major negative impact on flooding due to mitigation applied through District Plan policies. It is considered that the policy would still have a neutral impact on flooding. The impact on biodiversity also remains unchanged, as a minor negative impact, due to the loss of semi-improved grassland priority habitat and the site being within 7km of Ashdown Forest SAC/SPA.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.



Table B-69: Sustainability performance of Policy DPA7.

| Policy Option DPA7 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | +            | +                    | +         | +                   | 0                        | -                 | 0                           | 0         | 0                 | +                          | 0                | 0               | 0                     | +               |

Provision of sustainable transport measures would be expected to improve travel choice, with the policy requiring development proposals to “*provide suitable vehicular, pedestrian and cycle access*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Additionally, the policy requires delivery of new play space on site, as well as contributions towards sports facilities and other community infrastructure improvements. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A large proportion of the site coincides with good quality semi-improved grassland priority habitat which would be lost and / or degraded because of the proposed development. The policy requires on-site “*natural, semi-natural and amenity greenspace*” as well as ensuring SuDS deliver biodiversity / environmental improvements. Overall, a neutral impact on biodiversity would be expected (SA Objective 7).

The site is located within ‘Horsgate High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study (Hankinson Duckett Associates, 2007). Policy DPA7 states that the proposal should “*contain development to central and eastern parts of site to reduce potential impacts on setting on High Weald AONB (to be informed by an LVIA)*”. These measures, along with careful design and layout, may help to mitigate adverse effects and a neutral impact on the landscape character (SA Objective 8) would be likely.

Policy DPA7 requires the development to “*Provide appropriate layout and design which preserves the setting of nearby Grade II listed building ‘South Lodge’*” informed by a Heritage Impact Assessment. This may also help to inform appropriate and comprehensive mitigation for effects on ‘Borde Hill’ RPG, within which ‘South Lodge’ lies. An overall negligible impact on cultural heritage (SA Objective 9) could be achieved.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA.

#### B.13.9 DPA8: Orchards Shopping Centre, Haywards Heath

Policy DPA8, previously DPH12, relates to Site 1121, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-70: Sustainability performance of Policy DPA8.

| Policy Option DPHA8         | SA Objective |    |    |    |   |   |   |   |   |    |    |    |    |    |
|-----------------------------|--------------|----|----|----|---|---|---|---|---|----|----|----|----|----|
|                             | 1            | 2  | 3  | 4  | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     | ++           | ++ | ++ | ++ | + | + | 0 | + | 0 | ++ | -  | 0  | ++ | +  |
| Health and Wellbeing        |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Education                   |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Community and Crime         |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Natural Resources           |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Landscape                   |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Cultural Heritage           |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Climate change & transport  |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Energy and Waste            |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Water Resources             |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Economic regeneration       |              |    |    |    |   |   |   |   |   |    |    |    |    |    |
| Economic growth             |              |    |    |    |   |   |   |   |   |    |    |    |    |    |

The policy requires financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already assessed positively owing to the site's location with respect to existing facilities and the effects of other policies.

The policy seeks to *“Deliver a mixed-use development including retail, leisure, residential and other complimentary town centre uses to help provide a central and diverse hub for the town centre”* with good pedestrian connectivity. The emphasis on sustainable travel links and the likely improved offer of local services and shopping provides a likelihood of reducing transport related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 100 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

Furthermore, through the provision of a central and diverse hub for Haywards Heath incorporating active frontages and *“optimising the site's topography and taking into account the design principles set out in the 2020 Mid Sussex Design Guide SPD”*, there is potential for enhancement of the local townscape character and strengthening sense of place. Therefore, the policy could potentially result in a minor positive impact on landscape (SA Objective 8).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A negligible impact on biodiversity (SA Objective 7) would be expected.

Policy DPA8 requires the development to be *“Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II\* listed building ‘St Wilfrids Church’”*. An overall negligible impact on cultural heritage (SA Objective 9) would be expected.

#### B.13.10DPA9: Land to west of Turners Hill Road, Crawley Down

Policy DPA9, previously DPH13, relates to site 688, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a major policy update since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to integrate development with the site to the north (DPA10) such as through design of the site layout and by providing pedestrian and cycling connections, green infrastructure and ecological corridors which would now have a minor positive impact for biodiversity and landscape. The policy also now states that development should be *“directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity /*

environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding, and also on health and wellbeing.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Table B-71: Sustainability performance of Policy DPA9.

| Policy Option DPA9 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | ++           | +                    | +         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | -                | 0               | 0                     | +               |

The policy sets out provision of sustainable transport measures which would be expected to improve travel choice, with requirement to “Provide suitable access to Turners Hill Road to each of the three areas of the site”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to many services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport to some extent, although a minor negative impact would be expected overall for SA Objective 10. A negligible effect could be achieved overall regarding SA Objective 13, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site open space, and sports pitches to serve the new development, as well as financial contributions towards further community facilities, emergency services, and sustainable transport. The proposed development would also include a 50-bed care home. The policy would be likely to improve access to and provision of community and healthcare facilities, resulting in a minor positive impact on SA Objectives 2 and 4.

Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools, and particularly secondary schools, in the local area to ensure that the educational needs of the

development can be met, resulting in a minor positive impact on education (SA Objective 3).

The proposed sustainable travel improvements, including active travel links, may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 350 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The policy requires the development to *“address any impacts associated with Ancient Woodland (on and adjacent to the site); including Front Wood, Wallage Wood, Wallage Lodge Shaw, Bushy Wood, Pescotts Wood (east and west parcels) which will be excluded from development”* and *“avoid development in most sensitive areas, including the central ridge”*. A negligible impact on biodiversity would be expected (SA Objective 7).

The site is located within ‘Crawley Down Northern Fringe’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. The range of measures to reduce or mitigate adverse impacts on the rural landscape has been updated since the Regulation 18 Plan to include *“provide woodland buffer to existing vegetation along southern boundary and set development back from the Worth Way to mitigate potential visual impact to the route and help enhance its setting”, “a 5m landscape buffer to existing hedgerows”* and *“Provision of a county park in southern part of site and along western boundary linking to the north and south parts of the site”*. These measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a negligible impact on the landscape character would be expected (SA Objective 8), an improvement from the minor negative impact in the Regulation 18 SA.

Heritage officer comments provided by the Council during the Regulation 18 stage indicate that the development of the site could lead to a ‘moderate’ adverse impact on archaeology. The policy has been updated to *“Assess the areas of archaeological interest – Crest of Sandstone Ridge and stream running through the High Weald that has a potential pre-historic bank”*,” which would help to inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.11 DPA10: Hurst Farm, Turners Hill Road, Crawley Down

Policy DPA10, previously DPH14, relates to Site 743, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy since Regulation 18. The policy now states "avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding. The impact on biodiversity could now be considered a minor positive impact, instead of negligible, through the introduction of natural flood management measures that deliver environmental improvements.

Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below.

Table B-72: Sustainability performance of Policy DPA10.

| Policy Option DPA10 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | +         | 0                   | +                        | 0                 | +                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |

The policy sets out provision of “sustainable transport measures” including the requirement to “Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road”. These measures would be expected to improve travel choice. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to

existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4. The site is in close proximity to Site 688 and could benefit from the provision of play space, sports pitches and potential doctor surgery proposed within Policy DPA9 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools, and particularly secondary schools, in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is adjacent to two stands of ancient woodland: 'Pescotts Wood West' and 'Pescotts Wood East'. Policy DPA10 states "*address any impacts associated with ancient woodland along the western and south eastern edges of the site*" to protect the woodlands. Considering the existing development on site, and the adjacent residential areas, it is likely that the proposed introduction of 37 dwellings would not introduce a significant adverse effect on the ancient woodland. A negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within 'Crawley Down Northern Fringe' which has 'low/medium' capacity, according to the Landscape Capacity Study. Policy DPA10 states that "*Mitigation measures will be required to protect the setting and form of parts of the site that fall within and adjacent to sensitive landscape areas*". The site is relatively small-scale and enclosed by trees, with some existing development on site. Although there may be a change in the landscape character to some extent due to the proposed development, by providing a suitable buffer for the surrounding ancient woodland it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

Policy DPA10 requires the development to be "*informed by a Heritage Statement, provide layout and design which preserves the setting of Grade II listed building 'Westlands'*". An overall negligible impact on cultural heritage (SA Objective 9) would be expected.

#### B.13.12DPA11: Land rear of 2 Hurst Road, Hassocks

Policy DPA11, previously DPH15, relates to Site 210, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor

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negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-73: Sustainability performance of Policy DPA11.

| Policy Option DPA11 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | 0                    | ++        | +                   | +                        | -                 | 0                           | 0         | 0                 | ++                         | 0                | 0               | ++                    | +               |

The site is located within the settlement of Hassocks and has good connectivity to existing facilities and is well served by public transport infrastructure. Policy DPA11 seeks to further improve sustainable transport for the site, including *“suitable vehicular, pedestrian and cycle access including necessary offsite highways improvements”* which may encourage the uptake of active travel. The policy also requires financial contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to benefit health and wellbeing through improving the provision of and access to recreation and leisure facilities for the local community.

However, the site is located within 200m of ‘Mid Sussex AQMA No. 1’ and adjacent to the A273, with potential adverse implications for the health of site end users. The policy requires the development to *“Provide air quality mitigation to address impacts on the Stonepound Crossroads AQMA”* and *“Provide good acoustic design to address noise impacts associated with the A273”*, which may help to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Considering the trend of improvements in NO2 levels within the AQMA (MSDC, 2022b), alongside the proposed screening measures, a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

Policy DPA11 seeks to *“Mitigate potential impacts from development on TPOs in south east corner and along northern boundary”* and *“Provide appropriate landscaping taking into account any sensitive, longer views to the north west of the site”*. These measures would be likely to reduce adverse effects on the surrounding landscape character. By retaining the hedgerows which surround the site, and assuming new development would be in keeping with the existing adjacent housing development, it is anticipated that there would be a negligible impact overall for landscape (SA Objective 8).



These measures could also help to retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.13DPA12: Land west of Kemps, Hurstpierpoint

Policy DPA12, previously DPH16, relates to Site 13, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-74: Sustainability performance of Policy DPA12.

| Policy Option DPA12 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | +         | ++                  | +                        | -                 | 0                           | -         | -                 | ++                         | 0                | 0               | ++                    | +               |

The site is located within the settlement of Hurstpierpoint, and has relatively good connectivity to existing facilities and is well served by public transport infrastructure. The policy seeks the provision of “sustainable transport measures”, including a requirement to “create new pedestrian and cycle links to connect to the existing PROW network” which may encourage the uptake of active travel. The policy also requires an onsite play area and informal outdoor space, as well as financial contributions towards the provision of

community buildings, local community infrastructure and health. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2). The policy would also be likely to improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), and which is already assessed positively.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The policy seeks to “*provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors*” and “*protect and enhance the streams on the western boundaries and crossing the site*”. A negligible impact on biodiversity (SA Objective 7) would be expected. The site is located within ‘Hurstpierpoint Low Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study. Whilst the measures in the policy, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘high’ harm to the adjacent Langton Lane Conservation Area and Grade II Listed Building ‘Langton Grange’. Despite the policy requirements to “Provide appropriate mitigation” to address the impacts, informed by a Heritage Impact Assessment, it is likely that the loss of the current field systems would diminish the separation of the heritage assets from the settlement of Hurstpierpoint and could alter their settings. A minor negative impact on cultural heritage cannot be ruled out at this stage until the details of the proposals have been agreed (SA Objective 9).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.14DPA13: The Paddocks, Lewes Road, Ashurst Wood

Policy DPA13, previously DPH17, relates to Site 984, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-75: Sustainability performance of Policy DPA13.

| Policy Option DPA13 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | -                     | +               |

The site is located outside of sustainable travel times to some local facilities and services, including train stations. Policy DPA13 does not include specific provisions relating to sustainable transport or active travel, although it does encourage development to “*Avoid the appearance of a car-dominated layout*” which may serve to reduce reliance on private car use, to some extent. The policy also requires financial contributions towards play space, sports facilities and other community infrastructure; therefore, the development would be expected improve the provision of and access to recreation and leisure facilities with benefits to health and wellbeing (SA Objective 2), and for the local community (SA Objective 4) which is already assessed positively.

However, the site is located adjacent to the A22, with potential adverse implications for the health of site end users. The policy states the development should “*take a landscape-led approach to development and take into account the existing trees in the design and layout of the site*”, which may help to provide a buffer by retaining the existing trees at the site boundaries to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. The policy requires the development to “*provide suitable access from Lewes Road.*”. A negligible impact could be achieved with regard to transport (SA Objective 10).

The policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB, due to the potential impact on woodland and trees. The site is located within ‘Luxford High Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study. Policy DPH17 states that the proposal should “*take a landscape-led approach to development*”, retain the mature

trees and hedgerows surrounding the site, and “Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB”. The site is small-scale and enclosed by trees and existing development, with some existing buildings on site. Although there would be a change in the landscape character to some extent due to the proposed development, it is expected that adverse impacts on the landscape character could be reduced through the policy provisions and with reference to the design guide, with a negligible impact overall for landscape (SA Objective 8).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The southern edge of the site coincides with deciduous woodland priority habitat. The policy states that development will “Retain mature trees/ hedgerows on site boundaries” which would be expected to ensure there is no degradation or loss of the priority habitat. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.15 DPA14: Land at Foxhole Farm, Bolney

Policy DPA14, previously DPH18, relates to Site 1120, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-76: Sustainability performance of Policy DPA14.

| Policy Option DPA14 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | ++           | 0                    | -         | +                   | 0                        | -                 | 0                           | 0         | 0                 | -                          | -                | 0               | 0                     | +               |

The policy sets out provision of “sustainable transport measures” including the requirement to “Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272)” and “provide pedestrian and cycle access to The Street into the north part of the site between the properties of Westmeadow and Downland. In addition, explore potential for additional pedestrian and cycle access to The Street into the south-central part of the site”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport to some extent, although a minor negative impact would be expected overall for SA Objective 10. A negligible effect could be achieved overall regarding SA Objective 13, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires the development to “provide a country park between the north and south development parcels” as well as on site allotments and community working hub, and financial contributions towards play area, outdoor sports, health and local community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities. A minor positive impact on community is therefore expected (SA Objective 4).

However, the site is located adjacent to the A272, with potential adverse implications for the health of site end users in relation to exposure to pollution. The policy requires the development to “Retain mature trees/ hedgerows along site boundaries”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

The proposed sustainable travel improvements, including active travel links, may help to reduce transport related GHG emissions to some extent. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 200 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The policy requires development to “*explore opportunities to enhance education provision in the village that meets an identified local need*”. The policy has an intention to improve the provision of and access to schools in the local area; however, it does not set out a commitment or details of the education provision. Therefore, a minor negative impact on education is still anticipated at this stage (SA Objective 3).

The site is located within ‘Bolney Sloping High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA14 states that the proposal should “*retain the character of footpath 44Bo which runs along the site’s northern boundary and create a pedestrian link from the site*” and provide informal outdoor space including a community orchard and a Country Park which may help to promote access to outdoor space and enjoyment of the countryside. A negligible impact on the character of the landscape (SA Objective 8) and biodiversity (SA Objective 7) are anticipated.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ to ‘moderate’ adverse impact on nearby listed buildings, Bolney Conservation Area, and archaeology. Policy DPA14 states that the development should be “*Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed building, ‘Walnut and Well Cottage’, and Bolney Conservation Areas (North and South)*”. This would be likely to help inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.16DPA15: Ham Lane Farm House, Ham Lane, Scaynes Hill

Policy DPA15, previously DPH23, relates to Site 1020, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-77: Sustainability performance of Policy DPA15.

| Policy Option DPA15 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |   |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|---|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |   |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |   |
|                     | +            | +                    | +         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               | + |

The policy sets out provision of “sustainable transport measures” including the requirement to “provide suitable vehicular, pedestrian and cycle access from Ham Lane” and to “create new pedestrian links to existing PROW network”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The majority of site is located within ‘Scaynes Hill High Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. Policy DPA15 states that the proposal should “address any impacts associated with ancient woodland in the south east corner of the site”. The site is relatively small-scale and enclosed on two sides by existing

development. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees and hedgerows it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

The retention and enhancement of mature trees and hedgerows, and incorporation of a suitable buffer to protect the nearby ancient woodland ‘Anchor Wood’ to the south east, would be likely to reduce potential for adverse effects on biodiversity, and could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land because of the development.

### B.13.17 DPA16: Land at Ansty Fields and rear of North Cottages, Cuckfield Road, Ansty

Policy DPA16, previously DPH24, relates to Site 631, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy. Lepus' full assessment summary is included below with relevant updates.

Table B-78: Sustainability performance of Policy DPA16.

| Policy Option DPA16 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | 0                    | 0         | +                   | +                        | -                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | +               |

The policy includes provision of “sustainable transport measures” which would be expected to improve travel choice, with the policy requiring development proposals to “*integrate development with the site to the west (DPA17) by providing pedestrian and cycling connections and GI connectivity*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel



times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4) and helps the site in its performance against the health and wellbeing objective.

However, the site is located in close proximity to the A272, with potential adverse implications for the health of site end users. The policy requires the development to “*the layout of the site should take into account the location of the trees and allow for their future retention*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent by retaining trees along the site boundary. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3).

The site is relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPA16 also sets out to pay “*particular attention... to trees and hedgerows on the southern boundary adjacent to the PROW*” and ensure that the development design and layout reflects “*a transition from the built environment to the rural countryside*”. These measures would be likely to help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.18DPA17: Land to the west of Marwick Close, Bolney Road, Ansty

Policy DPA17, previously DPH25, relates to Site 784, which was assessed alongside reasonable alternatives in pre-mitigation and post-mitigation assessments. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

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There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged, namely related to tree retention and enhancement, and noise impacts. Lepus' full assessment summary is included below.

Table B-79: Sustainability performance of Policy DPA17.

| Policy Option DPA17         | SA Objective |   |   |   |   |   |   |   |   |    |    |    |    |    |
|-----------------------------|--------------|---|---|---|---|---|---|---|---|----|----|----|----|----|
|                             | 1            | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| Housing                     |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Health and Wellbeing        |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Education                   |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Community and Crime         |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Flooding & Surface Water    |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Natural Resources           |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Biodiversity & Geodiversity |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Landscape                   |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Cultural Heritage           |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Climate change & transport  |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Energy and Waste            |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Water Resources             |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Economic regeneration       |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
| Economic growth             |              |   |   |   |   |   |   |   |   |    |    |    |    |    |
|                             | +            | 0 | 0 | + | + | - | 0 | 0 | 0 | 0  | 0  | 0  | 0  | +  |

The policy includes provision of “sustainable transport measures” which would be expected to improve travel choice, with the policy requiring development proposals to “*Integrate development with the site to the east (DPA16) by providing pedestrian and cycling connections and green infrastructure connectivity*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).

However, the site is adjacent to the A272, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain and enhance the trees and retain the ground levels along the A272 Bolney Road which forms the western boundary of the site*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to

the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3).

The site is relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPA17 also states “*Particular attention should be given to trees and hedgerows on the southern boundary adjacent to the PROW and in the south-west of the site.*” and ensure that the development design and layout reflects “*a transition from the built environment to the rural countryside*”. These measures would be likely to help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. A negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### B.13.19DPA18: Land at Byanda, Hassocks

Policy DPA18, previously DPH27, relates to Site 1101, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-80: Sustainability performance of Policy DPA18.

| Policy Option DPA18 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                     | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | 0                    | 0         | ++                  | +                        | -                 | 0                           | 0         | 0                 | 0                          | +/-              | 0               | ++                    | ++              |

The policy sets out the allocation of the site for older persons’ accommodation, which would be expected to cater for the housing needs of the elderly population, taking into account the requirements of Policy DPH4, resulting in positive effects on housing and wellbeing. The site seeks to provide “*Suitable vehicular, pedestrian and cycle access from Brighton Road*”, which would be expected to improve travel choice for site end users, including sustainable transport connections, which are already relatively good in the settlement of Hassocks.

However, the site is located within 200m of ‘Mid Sussex AQMA No.1’ and adjacent to the A273, with potential adverse implications for the health of site end users. Considering the trend of improvements in NO2 levels within the AQMA (MSDC, 2022b), a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

The site is located within ‘Hurstpierpoint Southern Fringe’ which has ‘negligible / low’ capacity, according to the Landscape Capacity Study. The site is relatively small-scale and enclosed by trees and existing development, with some buildings currently on site. Policy DPA18 requires development to retain the existing mature trees and hedgerows along the site boundaries, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. A negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11).

B.13.20DPA19: Land at Hyde Lodge, Handcross

Policy DPA19, previously DPH28, relates to Site 1106, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the pre-mitigation assessment findings for this site.

There has been a minor update to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below with relevant edits.

Table B-81: Sustainability performance of Policy DPA19.

| Policy Option DPA19 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|---------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                     | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing             |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                     | +            | +                    | 0         | +                   | +                        | -                 | 0                           | -         | 0                 | 0                          | +/-              | 0               | 0                     | ++              |

The policy sets out the allocation of the site for older persons’ accommodation, which would be expected to cater for the housing needs of the elderly population, taking into account Policy DPH4, resulting in positive effects on housing and wellbeing, and the local community (SA Objective 4). The site seeks to “provide a pedestrian access in the south-east corner of the site where there is an existing gateway” and “provide access from the B2114 London Road”, which would be expected to improve travel choice for site end users, including sustainable transport connections.

However, the site is located adjacent to the A23, with potential adverse implications for the health of site end users. The policy requires the development to incorporate “provide good acoustic design to address any impacts from noise and air quality associated with the A23” and retain and enhance the tree belt along the road. These measures would be likely to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on sustainable travel improvements and the provision of older persons’ accommodation.

The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10.

This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to and from the site.

Landscape officer comments provided by the Council during the Regulation 18 stage indicate that the development of the site could lead to a 'moderate' adverse impact on High Weald AONB. The site is also located within 'Pease Pottage – Handcross High Weald' which has 'low' capacity, according to the Landscape Capacity Study. Policy DPA19 requires an LVIA to be undertaken to "*inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB*". Whilst these measures, along with considerate building design, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

The site coincides with deciduous woodland, along the western edge. Policy DPA19 seeks to "*provide an appropriate buffer to the Priority habitat (deciduous woodland) within the site on its western boundary*", with associated benefits to ecological corridors and habitat conservation. A negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land because of the development. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11).

## **B.14 Infrastructure**

### **B.14.1 DPI1: Infrastructure Provision**

Policy DPI1 aims to ensure that the Plan provides appropriate and proportionate infrastructure to deliver and support the proposed development, including schools and health facilities.

Two reasonable alternatives were considered for this policy. These were:

1. Have a detailed policy with expectation for all proposals.
2. Rely on national policy.

The assessment of these alternatives against the SA Objectives are in Table B-82 below.

Table B-82: Sustainability performance of Policy DPI1.

| Policy Option DPI1 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
| 1                  | 0            | +                    | +         | +                   | +                        | 0                 | 0                           | 0         | 0                 | +                          | +                | +               | +                     | +               |
| 2                  | 0            | +                    | +         | +                   | +                        | 0                 | 0                           | 0         | 0                 | +                          | +                | +               | +                     | +               |

Option 1 was brought forward as it would be more likely to help ensure that there are adequate services for all new residents in the area and could potentially improve the type and range of services available to current and future residents.

There has been a minor update to this policy since the Regulation 18 Plan to provide more clarity on delivering new infrastructure appropriately and safeguard existing infrastructure. Lepus' SA assessment remains unchanged, and the assessment is included in Table B-82 above and the full summary is included below.

This policy supports development proposals which would provide the infrastructure required to serve current and future residents, including utilities. Therefore, a minor positive impact on transport, energy and water resources could be expected in relation to potential improvements on public transport, energy efficient technologies and water supply and treatment infrastructure within the Plan area (SA Objectives 10, 11 and 12).

The delivery of services and facilities to support new communities may include health care services, leisure facilities (such as improvements to sports facilities), schools and delivery/maintenance of GI associated with new developments, which may include the provision of publicly accessible open spaces, and enhancements to public rights of way. The policy has the potential to have a minor positive impact on landscape and townscape (SA Objective 8), access to education (SA Objective 3) as well as the health and wellbeing of new communities (SA Objectives 2 and 4).

Furthermore, the policy could result in infrastructure improvements associated with the transport network and would support economic activity and encourage inward investment in the Plan area. The policy has the potential to have a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14).

The infrastructure improvements could also help to ensure the maintenance of existing flood defences. There is the potential for a minor positive impact on climate change adaptation and resilience to flood risk (SA Objective 5).

### B.14.2 DPI2: Planning Obligations

Policy DPI2 sets out the use of planning obligations in relation to the provision of affordable housing, appropriate mitigation of a multitude of potential development impacts, and monitoring of these obligations.

There has been a minor update to this policy which now provides more clarity on the impacts that a development may cause. The revised assessment since the Regulation 18 SA is included below.

Table B-83: Sustainability performance of Policy DPI2.

| Policy Option DPI2 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | +         | +                   | +                        | 0                 | ++                          | +         | 0                 | +                          | +                | 0               | 0                     | +               |

The impact of development criteria includes measures related to employment opportunities, health and wellbeing, education, social and community facilities, flood management, GI, biodiversity net gain and consideration of the integrity of the Ashdown Forest SAC and SPA, traffic improvements, active travel improvements, and waste management. The policy could help to ensure that site users are served by suitable infrastructure and are located in areas with good access to these services and facilities. Therefore, minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 4, 5, 8, 10, 11 and 14) and a major positive impact on biodiversity (SA Objective 7).

### B.14.3 DPI3: Major Infrastructure Projects

Policy DPI3 sets out the Council's approach to considering major infrastructure projects and sets out requirements for developers with respect to preparation of various documents to support details surrounding the major infrastructure project including Local Impact reports. The policy states that *“proposals should, where possible, contribute positively to the*



implementation of the spatial strategy and meet the underlying objectives of the plan” and should ensure that they “avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible”.

There has been a minor update to this policy since the Regulation 18 Plan. Lepus' assessment remains unchanged, and the full summary is included below with relevant edits.

Table B-84: Sustainability performance of Policy DPI3.

| Policy Option DPI3 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | +         | 0                   | +                        | 0                 | 0                           | 0         | 0                 | +                          | +                | 0               | +                     | +               |

Through ensuring large infrastructure projects contribute positively to the district’s spatial strategy, minor positive impacts on economic regeneration and growth (SA Objectives 13 and 14) within the district could result where improved infrastructure (for example roads and public transport) could promote better access to shops, services and other businesses. Additionally, large infrastructure projects could provide local residents with employment, further positively impacting the economy.

Policy DPI3 seeks to provide further guidance for large infrastructure projects to adhere to. Large infrastructure projects, once complete, could provide various benefits to the Plan area including residents’ health and wellbeing (for example hospital provision), education, flood risk management, public transport and energy efficiency and waste treatment (for example potential improvements to energy production and waste processing infrastructure) and therefore minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 5, 10 and 11).

The remaining topics covered within the SA Objectives are assessed as negligible for impacts from this policy where it aims to ensure major infrastructure projects “avoid and minimise impacts, and to mitigate and compensate for impacts”. Any future major infrastructure projects will be assessed for their sustainability performance in relation to these topics, and others, on a case-by-case basis through various legal procedures including those outlined within Policy DPI3.

#### B.14.4 DPI4: Communications Infrastructure

Policy DPI4 supports the provision of high-quality digital infrastructure, such as superfast broadband, and electronic communications throughout the Plan area, in order to meet the needs of the current and future population.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-85: Sustainability performance of Policy DPI4.

| Policy Option DPI4 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | 0                    | 0         | 0                   | 0                        | +                 | 0                           | 0         | 0                 | +                          | 0                | 0               | +                     | +               |

With improvements to broadband and electronic communications in the area under this policy, residents would be likely to have greater access to essential services from home. This would provide increased opportunities to work from home and access a wider range of employment opportunities, resulting in a minor positive impact on economic growth (SA Objective 14). Through increasing the range of employment opportunities available within the district, this policy could also result in a minor positive impact on economic regeneration (SA Objective 13).

Additionally, with improved access to online facilities and home working, this policy could potentially help to reduce the need to travel and reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change and transport, due to reduced emissions associated with less traffic, and transport (SA Objective 10).

Through preferring that communications infrastructure proposals “use to be made of existing sites rather than the provision of new sites” there may potentially be less undeveloped land and associated soil resources used for development, leading to minor positive impacts on natural resources (SA Objective 6).

### B.14.5 DPI5: Open Space, Sport and Recreational Facilities

Policy DPI5 seeks to increase the provision of green spaces and recreational facilities, helping to ensure residents have access to a diverse range of natural spaces and habitats.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-86: Sustainability performance of Policy DPI5.

| Policy Option DPI5 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | +                   | 0                        | 0                 | +                           | +         | 0                 | 0                          | 0                | 0               | 0                     | 0               |

This policy would be likely to help ensure residents have good access to open space, sport and recreational facilities, including play facilities for children and sports pitches. This would be expected to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health would be expected (SA Objective 2).

The provision of green spaces can help create attractive places to live and strengthen a sense of place for local communities and help contribute to a sense of community and social cohesion. By supporting the provision of green space across the Plan area, this policy would be expected to have a minor positive impact regarding community cohesion (SA Objective 4), as well as enhancing the multi-functional benefits of GI including in terms of biodiversity and landscape (SA Objectives 7 and 8).

### B.14.6 DPI6: Community and Cultural Facilities and Local Services

Policy DPI6 seeks to protect existing community facilities and support development proposals for new or improved facilities.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-87: Sustainability performance of Policy DPI6.

| Policy Option DPI6 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |   |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|---|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |   |
| Housing            |              | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |   |
|                    | 0            | +                    | 0         | +                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | 0               | 0                     | 0               | + |

This policy would be expected to ensure that existing local facilities are retained and enhanced, which would be likely to improve local residents' access to services such as health facilities, sports facilities and schools.

By encouraging the retention or provision of these community facilities, this policy would be expected to have a minor positive impact in regard to health, access to community facilities and supporting local businesses, potentially leading to economic growth (SA Objectives 2, 3, 4 and 14).

#### B.14.7 DPI7: Water and Wastewater Infrastructure

Policy DPI7 outlines the standards which development proposals must meet to be supported, in relation to water infrastructure, and covers topics such as water resources, pollution, quantity and foul water / sewage facilities.

This is a new policy since the Regulation 18 Plan. The policy requirements of DPS5 have been split between policy DPN6 which now covers matters in the water environment and this new policy DPI7 which encompasses criteria on water and wastewater infrastructure. The sustainability credentials of the policy remain unchanged, and Lepus' Regulation 18 assessment of DPS5 remains valid.

Table B-88: Sustainability performance of Policy DPI7.

| Policy Option DPI7 | SA Objective |                      |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |
|--------------------|--------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|
|                    | 1            | 2                    | 3         | 4                   | 5                        | 6                 | 7                           | 8         | 9                 | 10                         | 11               | 12              | 13                    | 14              |
|                    | Housing      | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |
|                    | 0            | +                    | 0         | 0                   | 0                        | 0                 | 0                           | 0         | 0                 | 0                          | 0                | ++              | 0                     | 0               |

This policy would be likely to help provide for future increased demand on water resources and wastewater infrastructure from an increasing population, as well as protecting the water environment from pollution. Overall, a major positive impact on water resources (SA Objective 12) can be expected as a result of this policy.

The policy also states that development should connect to a public sewage treatment works, and where it cannot proposals must set out the long-term management and maintenance, and *“be supported by sufficient information to understand the potential implications for the water environment, biodiversity and climate change”*.

#### B.14.8 DPI8: Viability

Policy DPI8 (was Policy DPI7 at Regulation 18) sets out a range of criteria which must be adhered to, in exceptional circumstances where a development proposal may generate insufficient value to support the full range of requirements set out in other District Plan policies.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-89: Sustainability performance of Policy DPI8.

| Policy Option DPI8 | SA Objective         |           |                     |                          |                   |                             |           |                   |                            |                  |                 |                       |                 |     |
|--------------------|----------------------|-----------|---------------------|--------------------------|-------------------|-----------------------------|-----------|-------------------|----------------------------|------------------|-----------------|-----------------------|-----------------|-----|
|                    | 1                    | 2         | 3                   | 4                        | 5                 | 6                           | 7         | 8                 | 9                          | 10               | 11              | 12                    | 13              | 14  |
| Housing            | Health and Wellbeing | Education | Community and Crime | Flooding & Surface Water | Natural Resources | Biodiversity & Geodiversity | Landscape | Cultural Heritage | Climate change & transport | Energy and Waste | Water Resources | Economic regeneration | Economic growth |     |
|                    | +/-                  | +/-       | +/-                 | +/-                      | 0                 | 0                           | 0         | 0                 | 0                          | +/-              | +/-             | +/-                   | +/-             | +/- |

The policy could potentially result in a benefit in terms of requiring applicants to robustly demonstrate through a Viability Appraisal how the proposal is economically unviable, to ensure there are valid reasons for departing from the required contributions. By setting the requirements out in a planning policy, this could give greater certainty regarding the delivery of appropriate infrastructure depending on the circumstance for each scheme.

However, the potential for “reductions in infrastructure contributions and/ or affordable housing provision” set out through this policy could result in possible adverse effects on the provision of social and community infrastructure including schools, affordable housing and choice in housing, open space and GI, transport infrastructure and renewable energy schemes. The effects of this policy on SA Objectives 1, 2, 3, 4, 10, 11, 12, 13 and 14 are uncertain. The policy would be unlikely to directly impact SA Objective 5, 6, 7, 8 and 9.

# C Appraisal of Reasonable Alternative Sites Pre-Mitigation in the Mid Sussex District Plan Review 2021 - 2039

## C.1 Introduction

The following sections provide an appraisal of each of the new reasonable alternative sites identified by Mid Sussex District Council in accordance with the SA framework and methodology.

The SA site assessment is structured based on the SA objectives and supporting questions outlined by Lepus Consulting which form the SA framework. Each subsection below focusses on a particular SA objective, presenting a scoring matrix for all sites assessed against each SA objective, supported by a rationale for the recorded impacts.

The SA process can rely upon professional judgement, and therefore the Regulation 18 SA and the decision-making used throughout that site assessment has been used to inform this site assessment.

## C.2 Updates to site assessment criteria

The Site Selection process involved assessing sites against 14 assessment criteria, one of which focussed on Listed Buildings (Criterion 5: Listed Buildings), and another on Conservation Areas (Criterion 6: Conservation Area), to consider the location of a potential site in relation to these designations. Since the Regulation 18 Plan, MSDC have amended these two criteria to reflect comments received from consultees, as well as review of the National Planning Policy Framework (NPPF).

These updated criteria outlined that for the Site Selection process, any site where scoring concluded 'Less than substantial harm' for Criterion 5 and Criterion 6 would result in an updated assessment score of 'negative impact', unless an assessment or review of heritage assets has been undertaken to enable the consideration of potential suitable mitigation on the identified heritage assets of the proposed scheme. All other criteria used for the Site Selection process remained as per the Regulation 18 Plan. Following consultee comments relating to the travel time data used to calculate distances for sites, the Council checked and updated the Site Selection conclusions as required.

The SA site assessment process is a separate process to the Site Selection process, providing an independent assessment of the likely environmental and socio-economic impacts of a site. It is considered that the amended Site Selection criteria, and potential for inclusion of mitigation, would not have an impact on the SA site assessment, therefore all Regulation 18 SA site assessment findings remain valid. However, where amendments have been made to the Site Selection process to correct erroneous travel time data, the SA site assessment has been updated to reflect this updated travel time data. These changes are outlined in Table C-1 below.

An overview of the updated assessments for the 14 sites where MSDC received comments from consultees on the Site Selection Conclusions is outlined below.

Table C-1: Updated assessments results for 14 reasonable alternatives.

| SHELAA Ref | Topic  | Previous score | Current score | Comment  |
|------------|--|----------------|---------------|--|
| 575        | Pedestrian Access to Community Facilities and Local Services(SA Objective 4 & 10)        | -              | -             | Changed from: Within to Over 20 minutes walk, over 30 minutes public transport         |
|            | Public Transport Access to Community Facilities and Local Services (SA Objective 4 & 10) | -              | -             | Changed from: Within to Over 20 minutes walk, over 30 minutes public transport         |
|            | Pedestrian Access to Primary Schools (SA Objective 3)                                    | -              | -             | Changed from: Within to Over 20 minutes walk   |
|            | Pedestrian Access to GP surgery (SA Objective 2)   | 0              | -             | Changed from: Within to Over 20 minutes walk   |
|            | Pedestrian Access to Convenience Store (SA Objective 10)                                 | -              | -             | Changed from: Within to Over 20 minutes walk   |
| 1022       | Listed Buildings (SA Objective 9)  | 0              | -             | Replaced: No impact with: Less than substantial harm – Low impact                      |
| 1030       | Pedestrian Access to Community Facilities and Local Services(SA Objective 4 & 10)        | -              | -             | Changed from: Within to Over 20 minutes walk, still within 30 minutes public transport |

### C.3 New reasonable alternative sites

#### C.3.1 SA Objective 1 - Housing

SA Objective 1 is to ensure that everyone has the opportunity to live in a home for their need and which they can afford. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Meet the housing requirement of the whole community, including of older people?
- Deliver a range of type, tenures and mix of homes the district needs over the plan period?



- Increase the supply of affordable homes?
- Provide for the housing need of an ageing population?
- Meet Gypsy and Traveller accommodation needs?

Table C-2: Site assessment matrix for Objective 1 - Housing.

| Site ref. | Score |
|-----------|-------|
| 1146      | +     |
| 1135      | +     |
| 1141      | +     |
| 1148      | +     |
| 1133      | +     |
| 1137      | ++    |
| 1122      | ++    |
| 29        | +     |

- Of the eight new sites identified, those identified as having a yield of 100 or more dwellings would be expected to have major positive impacts on housing provision. Sites which have been identified as having an expected yield of less than 100 dwellings are expected to have a minor positive impact on dwelling provision.
- Sites 1122, and 1137 are expected to provide a yield of 100, and 400 dwellings respectively, they are therefore assessed as having a major positive impact on housing. The remaining sites are assessed as having a minor positive impact on housing provision as they provide a yield ranging from 6-10 dwellings.

### C.3.2 SA Objective 2 - Health and Wellbeing

SA Objective 2 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Provide for additional facilities to support the need of new and growing communities?
- Improve access to health care facilities and social care services?
- Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure and recreation and sports facilities?
- Promote healthy lifestyle choices by encouraging and facilitating walking and cycling?
- Support special needs and ageing populations?
- Increase access to open space facilities including the countryside?

Table C-3: Sites impact matrix for SA Objective 2 - Health and Wellbeing.

| Site Ref. | Hospital with A&E | Access to GP Surgery | Leisure Centres | AQMAs | Main Road | Access to Green-space | Loss of Green-space | PROW/ Cycle Paths |
|-----------|-------------------|----------------------|-----------------|-------|-----------|-----------------------|---------------------|-------------------|
| 1146      | -                 | -                    | -               | +     | +         | +                     | -                   | +                 |
| 1135      | +                 | -                    | -               | +     | -         | +                     | -                   | +                 |
| 1141      | +                 | -                    | -               | +     | +         | +                     | -                   | +                 |
| 1148      | +                 | -                    | -               | +     | -         | +                     | -                   | +                 |
| 1133      | -                 | -                    | -               | +     | -         | +                     | -                   | +                 |
| 1137      | +                 | -                    | -               | +     | +         | +                     | -                   | +                 |
| 1122      | +                 | +                    | +               | +     | +         | +                     | -                   | +                 |
| 29        | +                 | +                    | -               | +     | -         | +                     | -                   | +                 |

#### NHS hospital with A&E Department

There are two NHS hospitals with A&E Departments in Mid Sussex district, the Princess Royal in Haywards Heath and Queen Victoria in East Grinstead. The target distance, outlined by Lepus Consulting within Regulation 18 SA, for sustainable access to an NHS hospital with A&E department is 5km. Sites 29, 1141, 1135, 1148, 1122 and 771 are within a 5km buffer of either hospital, therefore the proposed development of these five sites is expected to have a minor positive impact on access to essential healthcare.

Sites 1146 and 1133 are located outside of the target distance, and therefore proposed development at these sites are expected to have a minor negative impact on access to essential healthcare.

#### Pedestrian Access to GP Surgery

There are twenty-six GP surgeries in Mid Sussex district, the target distance for sustainable access outlined by Lepus Consulting within the Regulation 18 SA to a GP surgery is approximately 1.2km or a 15-minute walk.

Sites 29 and 1122 are located within the target distance of 15 minutes' walk from the nearest GP surgery, therefore, proposed development of this site would be expected to have a minor positive impact on access to healthcare.

Sites 1133, 1135, 1137, 1141, 1146, 1148, are located over 20 minutes' walk from the nearest GP surgery. It would be expected that proposed development of these sites would have a minor negative impact on access to healthcare.

## Leisure Centres

There are three leisure centres located in Mid Sussex district, these are located in Haywards Heath, East Grinstead and Burgess Hill. In the Regulation 18 SA by Lepus Consulting, the target sustainable distance from the proposed developments to a leisure centre is 1.5km.

All of the additional proposed development sites are located outside of the 1.5km target distance except for Site 1122, therefore, the remaining sites would be expected to have a minor negative impact on access to these facilities.

The development of site 1122 would be expected to have a minor positive impact on the health and wellbeing of site users.

## Air Quality Management Areas (AQMAs)

The target distance outlined by Lepus Consulting within Regulation 18 SA from an AQMA is 200m.

All of the additional proposed development sites are located at least 200m from an AQMA therefore, a minor positive impact on human health would be expected for site users at these sites.

## Main Roads

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites located within 200m from a main road would be expected to have a minor impact on the health and wellbeing of site users. Development in these locations may have the potential to expose site users to higher levels of transport associated air and noise pollution.

Sites 1133, 1135, 1148, 29 are located less than 200m from main roads. The proposed development of these four sites is therefore expected to have a minor negative impact on the health and wellbeing of site users.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road and are therefore expected to have a minor positive impact on the health and wellbeing of site users.

## Access to Greenspace

Access to greenspace is associated with a range of mental and physical health benefits. As outlined by Lepus Consulting within Regulation 18 SA, if a site is located within 300m of an OS Greenspace site (OS Greenspace, 2022), or a multi-functional greenspace, a minor positive impact is expected on site users' health and wellbeing.

All of the additional sites are located within 300m of OS Greenspace sites or multi-functional greenspaces; therefore development of these sites is expected to have a minor positive impact on site users health and wellbeing.

## Net Loss of Greenspace

None of the proposed additional sites coincide with OS Greenspaces or multi-functional greenspace. Therefore no net loss of greenspace is expected from the additional sites.

## PRoW/Cycle Paths

Proposed sites which have good accessibility to the PRoW and/or National Cycle Network would likely encourage engagement in physical activity and active travel resulting in a minor positive impact on health and wellbeing.

All sites are expected to provide access to Mid Sussex's PRoW network and therefore, are likely to provide a minor positive impact on access to this amenity and health benefits.

### C.3.3 SA Objective 3 - Education

SA Objective 3 is 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. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Reduce crime/ fear of crime and anti-social activity?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table C-4: Site impact matrix for SA Objective 3 - Education.

| Site ref. | Pedestrian Access to Primary School | Pedestrian Access to Secondary School | Further Education |
|-----------|-------------------------------------|---------------------------------------|-------------------|
| 1146      | ++                                  | -                                     | +                 |
| 1135      | -                                   | -                                     | +                 |
| 1141      | -                                   | -                                     | +                 |
| 1148      | -                                   | -                                     | +                 |
| 1133      | ++                                  | -                                     | -                 |
| 1137      | -                                   | -                                     | +                 |
| 1122      | +                                   | +                                     | +                 |
| 29        | +                                   | -                                     | +                 |

### Pedestrian Access to Primary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable target distance for a residential site to a primary school is within a 15-minute walk (approximately 1.2km).

Sites 1146 and 1133 are located within a 10-minute walk from a primary school. This is expected to have a major positive impact on access to primary school education for site users.

Sites 1122 and 29 are located within a 15-minute walk from a primary school. This is expected to have a minor positive impact on access to primary school education for site users.

Sites 1135, 1141, 1148 and 1137 are located over a 20-minute walk from a primary school. This is expected to have a minor negative impact on the access to primary school education for site users.

### Pedestrian Access to Secondary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable distance to secondary education has been identified as 1.5km from a residential site.

Site 1122 is located within 1.5km of the Oathall Community College. Therefore, development of this site is expected to have a minor positive impact on access to secondary education for site users.

Sites 1133, 1137, 1141, 1145, 1146, 1148, and 29 are located outside of the target distance. Therefore it is expected that proposed development of these sites will likely have a minor negative impact on access to secondary education for site users.

### Further Education

As outlined by Lepus Consulting within Regulation 18 SA, residential sites which are located within 3km from a further education facilities are expected to have good access to these facilities.

The majority of the additional proposed sites are located within 3km of further educational facilities in Mid Sussex District. Therefore, the development of these proposed sites could be expected to have a minor positive impact on access to further education for site users.

Site 1133 is not located within 3km of a further educational facility and therefore a minor negative impact on access to further education could be expected for site users.

### C.3.4 SA Objective 4 - Community and Crime

SA Objective 4 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Reduce crime/ fear of crime and anti-social activity?
- Promote design that discourages crime?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table C-5: Site impact matrix for SA Objective 4 - Community and Crime.

| Site Ref | IMD | Pedestrian Access to Community Facilities | Public Transport Access to Community Facilities | Loss of Community Facilities | Built Up Area Boundary |
|----------|-----|---|---|------------------------------|------------------------|
| 1146     | 0   | -   | -   | 0                            | 0                      |
| 1135     | 0   | -   | -   | 0                            | 0                      |
| 1141     | 0   | -   | -   | 0                            | 0                      |
| 1148     | 0   | -   | -   | 0                            | 0                      |
| 1133     | 0   | -   | -   | 0                            | 0                      |
| 1137     | 0   | -   | +   | 0                            | 0                      |
| 1122     | 0   | +   | +   | -                            | 0                      |
| 29       | 0   | -   | -   | 0                            | 0                      |

### Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation across Lower Layer Super Output Areas (LSOA), which is a geographical region of a population size of approximately 1,500. LSOAs are used for the reporting of small area statistics in England and Wales. The IMD utilises seven key domains and 39 indicators of deprivation which are weighted and used to calculate the index, all LSOAs are ranked into deciles. As outlined by Lepus Consulting within Regulation 18 SA, for the purposes of this analysis the proposed sites have been assessed for their location in an LSOA within the 10% most deprived in England and Wales.

Deprivation across the district varies, however, none of the proposed sites fall within an LSOA within the 10% most deprived areas, therefore each site has been given a neutral score.

### Pedestrian Access to Community Facilities

For the purposes of this assessment, the term community facilities refer to convenience shops community halls, places of worship and libraries. As outlined by Lepus Consulting within Regulation 18 SA, the target distance from the proposed sites and community facilities is within a 15-minute walk.

Site 1122 is located within a 15 minute-walk from community facilities, therefore development at this site is expected to have a minor positive impact on access to community facilities.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these sites is expected to have a minor negative impact on access to community facilities.

### Public Transport Access to Community Facilities

As outlined by Lepus Consulting within Regulation 18 SA, sites which are located within a 30-minute journey or less using public transport to access community facilities such as a shop, a community hall, a place of worship or library would be expected to have a minor positive impact on accessibility of community facilities for site users.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to community facilities. Therefore, development at these proposed sites would be expected to have a minor negative impact on access to community facilities.

Sites 1137 and 1122 are located within a 20-minute journey using public transport to community facilities. Therefore, development at these locations would be expected to have a minor positive impact on access to community facilities.

### Loss of Community Facilities

Site 1122 coincides with the location of a convenience store and post office; therefore, the proposed development of this site could result in the loss of these amenities. Following the decision-making process applied by Lepus Consulting in the Regulation 18 SA, this could therefore be expected to have a minor impact on the provision of community facilities.

None of the remaining proposed development sites coincide with existing community facilities.

### Built Up Area Boundary

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites which are located over 150m from a built-up area boundary are expected to have a negative impact on community cohesion and integration with existing local communities. However, none of the additional sites proposed are located over 150m from a built-up area boundary, therefore each site has been given a neutral score.

### C.3.5 SA Objective 5 - Flooding

SA Objective 5 is to reduce the risk to people, properties, the economy and the environment of flooding from all sources. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?
- Promote the use of Natural Flood Management schemes, SuDS and flood resilient design?
- Incorporate sustainable design and construction techniques?

Table C-6: Site impact matrix for SA Objective 5 - Flooding.

| Site Ref | Fluvial Flood Risk | Surface Water Flood Risk |
|----------|--------------------|--------------------------|
| 1146     | +                  | -                        |
| 1135     | +                  | +                        |
| 1141     | +                  | -                        |
| 1148     | +                  | +                        |
| 1133     | +                  | --                       |
| 1137     | +                  | --                       |
| 1122     | +                  | -                        |
| 29       | +                  | -                        |

### Fluvial Flood Risk

All of the additional proposed sites are located in Flood Zone 1, where the risk of flooding is less than 0.1% each year. Therefore proposed development at this site would place site users at a low risk of flooding therefore a minor positive impact could be expected.

### Surface Water Flood Risk

Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high 1/30) risk relating to the probability of surface water flooding occurring in a given area.

Sites 1122, 1141, and 1146 coincide with areas of low risk from surface water flooding and Site 29 is at medium risk of surface water flooding. Therefore, the development of these sites could have a minor negative impact on flooding.

Sites 1133 and 1137 coincide with areas of high risk from surface water flooding. Therefore, the development of these sites could have a major negative impact for site users.

Sites 1135 and 1148 do not coincide with areas at risk of surface water flooding. Therefore development of these sites would be expected to have a minor positive impact.

### C.3.6 SA Objective 6 - Natural Resources

SA Objective 6 is 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. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Support the redevelopment of previously developed land?
- Make best use of land?
- Encourage the construction of more sustainable homes?
- Minimise the loss of open countryside to development?
- Minimise the loss of the best and most versatile agricultural land to development?



- Maintain and enhance soil quality?

Table C-7: Site impact matrix for SA Objective 6 - Natural Resources.

| Site Ref | Previously Developed Land | Agricultural Land Classification | Mineral Safeguarding Area |
|----------|---------------------------|----------------------------------|---------------------------|
| 1146     | -                         | -                                | -                         |
| 1135     | -                         | -                                | 0                         |
| 1141     | -                         | -                                | -                         |
| 1148     | -                         | -                                | 0                         |
| 1133     | -                         | -                                | -                         |
| 1137     | -                         | --                               | -                         |
| 1122     | +                         | 0                                | 0                         |
| 29       | -                         | -                                | 0                         |

#### Previously Developed Land

Site 1122 is largely comprised of previously developed land, so development at this location would have a minor positive impact on natural resources through efficient use of land.

Sites 1133, 1135, 1146, 1141, 29, 1137 and 1148 partially or wholly comprise undeveloped land which may have minor negative impacts on natural resources through their permanent and irreversible loss.

#### Agricultural Land Classification (ALC)

Site 1122 is located upon land which is classified as urban, therefore is expected to have negligible impacts on agricultural land.

Sites 1133, 1141, 1135, 1146, 1148 and 29 are located upon land in ALC Grade 3, and are less than 20ha. The proposed development of these sites would likely have a minor negative impact on agricultural land through the irreversible loss of Best and Most Versatile (BMV) soil resources.

Site 1137 is located upon ALC Grade 3 and is over 20ha. The proposed development at this site would be expected to have a major negative impact on agricultural land through the irreversible loss of BMV soil resources.

#### Mineral Safeguarding Area

Areas of nationally and locally important mineral resources which should be protected from unnecessary sterilisation are designated as Mineral Safeguarding Areas (MSAs).

Sites 1122 and 1135, 1148 and 29 do not coincide with MSAs and therefore proposed development of these sites is expected to have a negligible impact on mineral resources.

Sites 1133, 1137, and 1146 are located within a MSA for Brick clay and Site 1141 is located within MSA for Consolidated bedrock. The development of these sites could potentially lead to the sterilisation of these mineral resources. Therefore, the proposed sites would have a minor negative impact on natural resources.

### C.3.7 SA Objective 7 - Biodiversity and Geodiversity

SA Objective 7 is to conserve and enhance the district's biodiversity and geodiversity. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Avoid adverse effects on internally and nationally designated biodiversity and geodiversity assets within and outside the district, including Ancient Woodland?
- Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?
- Provide and manage the opportunities for young people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?

Table C-8: Site impact matrix for SA Objective 6 – Biodiversity and Geodiversity.

| Site Ref | Habitat Sites | SSSI | Ancient Woodlands | Veteran Trees | Local Nature Reserves | Local Wildlife Sites | Priority Habitats |
|----------|---------------|------|-------------------|---------------|-----------------------|----------------------|-------------------|
| 1146     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 1135     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 1141     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 1148     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 1133     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 1137     | 0             | 0    | --                | 0             | 0                     | 0                    | -                 |
| 1122     | 0             | 0    | 0                 | 0             | 0                     | 0                    | 0                 |
| 29       | 0             | 0    | --                | 0             | 0                     | 0                    | 0                 |

#### Habitat Sites

Habitat sites are designated environmental sites which have been identified and protected for their ecological interest. There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites located in the district. However Ashdown Forest SPA and SAC is located to the east in a neighbouring authority (East Sussex). As outlined by Lepus Consulting within Regulation 18 SA, the proposed sites have been assessed for their location within Ashdown Forest SPA and SAC 7km Zone of Influence (MSDC, 2022a), previously established by MSDC.

None of the proposed development sites are located within the 7km Zone of Influence, therefore, their development is likely to have negligible impacts on Ashdown Forest SPA and SAC.

#### Sites of Special Scientific Interest

None of the proposed development sites are located within a SSSI impact risk zone, therefore, their development is likely to have negligible impacts on SSSIs in MSDC.

#### Ancient Woodlands

There are several large areas of Ancient Woodland concentrated to the north of the district, including Worth Forest and Wakehurst Park.

Sites 1137 and 29 are located adjacent to or within Ancient Woodland within the district and therefore development at these locations are expected to result in a direct loss of these assets and a major negative impact.

Sites 1122, 1133, 1141, 1135, 1146, and 1148 are not located within or in proximity to Ancient Woodland, therefore development of these sites is expected to have a negligible impact on these biodiversity assets.

#### Veteran Trees

None of the proposed development sites coincide with the location of veteran trees. Therefore development at these locations would have a negligible impact on veteran trees.

#### Local Nature Reserves

None of the proposed development sites are located in proximity to Local Nature Reserves, therefore a negligible impact is expected.

#### Local Wildlife Sites

There are several Local Wildlife Sites (LWSs) located across the district. All of the proposed sites are not located within or in proximity to an LWS. Therefore a negligible impact can be expected.

#### Priority Habitats

Priority habitats are prevalent throughout the district and include deciduous woodland, grass moorland and traditional orchards. Site 1137 coincides with areas of priority habitat, Therefore, development at this site could result in the loss or degradation of these habitats. As a result, a minor negative impact is assessed.

None of the other proposed sites coincide with priority habitat, therefore a negligible impact is assessed.

### C.3.8 SA Objective 8 – Landscape

SA Objective 8 is to protect, enhance and make accessible for enjoyment the district’s countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Conserve and enhance the High Weald ANOB?
- Conserve and enhance the settings of the South Downs National Park?
- Protect and enhance settlements and their settings within the landscape across the district?
- Protect and enhance landscape character?
- Promote high quality design in context with its rural and urban landscape?
- Maintain and where possible increase accessibility to the countryside and more generally to open spaces?

Table C-9: Site impact matrix for SA Objective 7 – Landscape.

| Site ref | AONB | National Park | Landscape Capacity | County Park | Alter Views | Coalescence | Urban Sprawl | Multifunctional Green-space | Tree Preservation Order |
|----------|------|---------------|--------------------|-------------|-------------|-------------|--------------|-----------------------------|-------------------------|
| 1146     | 0    | 0             | -                  | 0           | -           | 0           | 0            | +                           | -                       |
| 1135     | 0    | 0             | -                  | 0           | -           | 0           | 0            | +                           | 0                       |
| 1141     | 0    | 0             | -                  | 0           | -           | 0           | 0            | +                           | 0                       |
| 1148     | 0    | 0             | -                  | 0           | -           | 0           | 0            | +                           | 0                       |
| 1133     | 0    | 0             | -                  | 0           | -           | -           | 0            | +                           | 0                       |
| 1137     | 0    | -             | -                  | 0           | -           | 0           | -            | +                           | 0                       |
| 1122     | 0    | 0             | +                  | 0           | -           | 0           | 0            | +                           | 0                       |
| 29       | 0    | 0             | 0                  | 0           | 0           | 0           | 0            | +                           | 0                       |

#### High Weald Area of Natural Beauty

The High Weald Area of Natural Beauty (ANOB) is located to the north of Mid Sussex district. None of the proposed development sites are located in the AONB and therefore a negligible impact can be expected.

#### South Downs National Park

The South Downs National Park is located to the south of the district. Site 1137 is located in proximity to the National Park, therefore development in this location may alter the park’s setting resulting in a minor negative impact.

None of the other additional sites are located within proximity to the National Park and therefore, a negligible impact can be expected.

### Landscape Capacity

As outlined by Lepus Consulting within the Regulation 18 SA, landscape capacity is defined as “the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type” (Natural England, 2013).

Site 1122 is located in an area of high landscape capacity, therefore, development at this location could have a minor positive impact on local landscape.

Site 29 is located in an area of medium landscape capacity. Proposed development at this location is assessed as having a negligible impact on the landscape setting.

Sites 1137, 1135, 1141, 1146, 1148 and 1133 are located in an area of low or low to medium landscape capacity where development in this area could have the potential to significantly impact landscape character and setting. Therefore, development at this site could be expected to have a minor negative impact on landscape.

### Country Park

There are several Country Parks located across the district. None of the proposed sites are located within or in proximity to a Country Park, therefore a negligible impact is expected for the development of all additional sites.

### Alter Views for ProW Network Users

All proposed sites, except for site 29, are located in the vicinity of the ProW network and the development of these sites could potentially alter the views of countryside or open space currently experienced by the users of ProW. Therefore a minor negative impact on local landscape can be expected.

Site 29 is separated from ProWs by existing built form, and its development would therefore be unlikely to significantly alter views experienced by ProW users, therefore having a neutral impact.

### Increased Risk of Coalescence

Site 1133 is located between the existing settlements of Crosspost and Bolney. Development at this location could lead to the loss of separation between settlements and potentially have a minor negative impacts in relation to coalescence.

The other proposed sites would be expected to have a negligible impact in relation to coalescence.

### Urban Sprawl

Site 1137 is located outside of existing settlements within Mid Sussex, therefore development at this location could increase the risk of urban sprawl resulting in a minor negative impact on landscape.

All other sites proposed are located adjacent to or within to existing settlements, therefore a negligible impact is assessed.

### Multi-functional Greenspace

As outlined by Lepus Consulting within the Regulation 18 SA, sites located within 300m of a multi-functional greenspace would expect to improve accessibility of countryside and open space for site users.

All of the proposed sites are located within target distance of multi-function greenspace, improving accessibility to the countryside and open space for site users resulting in a minor positive impact.

### Tree Preservation Order

A Tree Preservation Order (TPO) is an order created by local authorities in England to protect individual trees, groups of trees or areas of woodland. Site 1146 coincides with an individual tree designated under a TPO. The development of this site could directly harm this protected tree during construction and operational pressures, therefore a minor negative impact is expected.

### C.3.9 SA Objective 9 – Cultural Heritage

SA Objective 9 is to protect, enhance and make accessible for enjoyment, the district's historic environment. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Protect, enhance and restore buildings, monuments, sites, places, areas and landscape of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?
- Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?
- Reduce the number of buildings at risk?
- Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies?
- Enhance accessibility to cultural heritage assets?

Table C-10: Site impact matrix for SA Objective 9 – Cultural Heritage.

| Site ref. | Listed Buildings | Conservation Area | Scheduled Monument | Registered Parks and Gardens | Archaeology |
|-----------|------------------|-------------------|--------------------|------------------------------|-------------|
| 1146      | -                | 0                 | 0                  | 0                            | 0           |
| 1135      | -                | 0                 | 0                  | 0                            | -           |
| 1141      | -                | 0                 | 0                  | 0                            | 0           |
| 1148      | -                | 0                 | 0                  | 0                            | 0           |
| 1133      | -                | -                 | 0                  | 0                            | -           |
| 1137      | 0                | 0                 | 0                  | 0                            | -           |
| 1122      | 0                | -                 | 0                  | 0                            | 0           |
| 29        | -                | -                 | 0                  | 0                            | 0           |

#### Listed Buildings (Grades I, II\* and II)

There are numerous Listed Buildings across the district.

Sites 1133, 1135, 1141, 1146, 1148 and 29 are located in proximity to Listed Buildings and therefore have been identified to have potential to cause ‘medium’ or ‘high’ impact on these heritage assets. Therefore, development of these proposed sites would be expected to have a minor negative impact.

Sites 1122 and 1137 are identified as being unlikely to have significant impacts on the setting of any Listed Building.

#### Conservation Area

There are 36 Conservation Areas (Cas) across Mid Sussex.

Sites 1122, 1133 and 29 are located in close proximity to Cas and have been identified with potential to cause moderate impact on the designation. Therefore a minor negative impact from the development of the proposed sites would be expected.

Sites 1135, 1137, 1141, 1146, 1148 are not located near to any CA and are therefore identified as being unlikely to have significant impacts on Cas.

#### Scheduled Monument

None of the proposed additional sites are located in proximity to any Scheduled Monuments (SM) across the district. The proposed development at these sites is likely to have negligible impact on SMs.

#### Registered Park and Gardens

None of the proposed additional sites are located in proximity from a Registered Park and Gardens, therefore, development at these sites is assessed as having a negligible impact on the setting of any Registered Park and Gardens.

## Archaeology

Sites 1122, 1141, 1146, 1148, and 29 are not located in areas of archaeological interest. Therefore the development at these locations is unlikely to have significant impacts on archaeological assets, for the purposes of this assessment a negligible impact is recorded.

Site 1133, 1135, 1137 is located in an area of archaeological interest. Therefore, development at these locations would be expected to have minor negative impact on archaeological assets.

### C.3.10 SA Objective 10 – Climate Change and Transport

SA Objective 10 is to reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Develop more efficient land use patterns that minimise the need to travel by car through the location and design of new development and place which provide more opportunities for active travel for the provision and link to public transport infrastructure?
- Reduce CO2 emissions to contribute to identified national targets?
- Improve accessibility to work and services by public transport, walking and cycling?
- Protect and improve air quality?
- Avoid exacerbating existing air quality issues in designated AQMAs?
- Achieve a healthy living environment?

Table C-11: Site impact matrix for SA Objective 10 – Climate Change and Transport.

| Site Ref. | AQMA | Main Road | Bus Services | Railway Station | Public Transport access to Local Services | Pedestrian Access to Local Services | Pedestrian Access to Convenience Store |
|-----------|------|-----------|--------------|-----------------|---|-------------------------------------|--|
| 1146      | +    | +         | +            | -               | -   | -                                   | -                                      |
| 1135      | +    | -         | +            | -               | -   | -                                   | ++                                     |
| 1141      | +    | +         | +            | -               | -   | -                                   | ++                                     |
| 1148      | +    | -         | +            | -               | -   | -                                   | ++                                     |
| 1133      | +    | -         | 0            | -               | -   | -                                   | ++                                     |
| 1137      | +    | +         | 0            | -               | +   | -                                   | -                                      |
| 1122      | +    | +         | ++           | +               | +   | +                                   | ++                                     |
| 29        | +    | -         | 0            | -               | -   | -                                   | ++                                     |

## Air Quality Management Areas



The target distance outlined by Lepus Consulting within the Regulation 18 SA from an AQMA is 200m.

All of the proposed additional development sites are located at least 200m from an AQMA therefore, a minor positive impact on climate change and transport is assessed as these sites are not expected to contribute further to areas generally associated with traffic congestion.

### Main Road

The target distance outlined by Lepus Consulting within Regulation 18 SA from a main road is 200m.

Sites 1133, 1135, 1148 and 29 are located less than 200m from main roads. Proposed development at these sites could have a minor negative impact on transport related emissions by potentially increasing congestion in the local area.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road. Proposed development at these sites would be expected to have a minor positive impact on congestion and consequential emissions.

### Bus Services

Bus service provision varies across the rural settlements in Mid Sussex District. Site 1122 has been identified as having the potential for excellent bus transport access.

Sites 1133, 1137 and 29 have been identified as having the potential for fair bus transport access. Therefore, proposed development at these sites would be expected to have a negligible impact on access to sustainable transport for site users.

Sites 1135, 1141, 1146 and 1148 have been identified as having the potential for good bus transport access. Proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport for site users.

Site 1122 has been identified as having the potential for excellent bus transport access. Proposed development at this site would be expected to have a major positive impact on access to sustainable transport for site users.

### Railway Station

There are two railway lines through Mid Sussex running from north to south. There are several train stations including Haywards Heath and Burgess Hill. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance of a 1.2km has been applied.

Site 1122 is located within the target distance and are therefore, expected to have a major positive impact on sustainable access to rail services.

Sites 1133, 1137, 1141, 1135, 1146, 1148 and 29 are located outside the target distance and therefore, proposed development at these locations is expected to have a minor negative impact on sustainable access to rail services.

#### Public Transport Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey by public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on transport and accessibility.

Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on transport and accessibility.

#### Pedestrian Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at the proposed sites is expected to have a minor negative impact on accessibility.

#### Pedestrian Access to Convenience Store

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to a convenience store is a 15-minute walk or cycle (1.2km).

Sites 1122, 1133, 1135, 1141, 1148 and 29 are within a 15-minute walk of a convenience store. Therefore, a major positive impact on accessibility to these facilities for site users would be expected.

Sites 1146 and 1137 are located outside this target distance and therefore development at these sites would be expected to have a minor negative impact on site users accessibility to these facilities.

#### C.3.11 SA Objective 11 - Energy and Waste

SA Objective 11 is to increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Reduce energy consumption?
- Reduce waste generated per head of population?
- Increase rate per head of population of waste reuse and recycling?
- Encourage recycling (including building materials)?
- Incorporate sustainable design and construction techniques?

Table C-12: Site impact matrix for SA Objective 11 - Energy Consumption.

| Site ref. | Household Waste Generation | Energy Consumption related to GHGs |
|-----------|----------------------------|------------------------------------|
| 1146      | 0                          | 0                                  |
| 1135      | 0                          | 0                                  |
| 1141      | 0                          | 0                                  |
| 1148      | 0                          | 0                                  |
| 1133      | 0                          | 0                                  |
| 1137      | -                          | -                                  |
| 1122      | 0                          | -                                  |
| 29        | 0                          | 0                                  |

#### Increase in Household Waste Generation

As outlined by Lepus Consulting within the Regulation 18 SA, to some degree, residential development is likely to result in an increase in household waste generation.

Site 1137 is expected to yield approximately 400 dwellings, therefore, development of this site would be expected to increase household waste generation by more than 0.1% compared to current levels. Therefore, this could result in a minor negative impact on household waste generation.

All of the other proposed developments are expected to produce a yield of 100 dwellings or less, therefore, development of this site is expected to have negligible impacts on household waste generation in comparison to current levels.

#### Increase in Energy Consumption Related Green House Gas Emissions (GHG)

As outlined by Lepus Consulting within the Regulation 18 SA to an extent, residential development is likely to result in an increase in energy related GHG emissions through the use of electricity sourced from fossil fuels.

Sites 1137 and 1122 are expected to have a yield of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.

The remaining sites are expected to have a yield of less than 100 dwellings, therefore the proposed development at these sites could have a negligible impact on GHG emissions relating to energy consumption.

### C.3.12 SA Objective 12 - Water Resources

SA Objective 12 is to maintain and improve the water quality of the district’s watercourses and aquifers, and to achieve sustainable water resources management. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Protect and enhance water resources?
- Support the achievement of Water Framework Directive targets?
- Promote sustainable use of water?
- Maintain water availability or water dependant habitats?
- Support the provision of sufficient water supply and treatment infrastructure?
- Incorporate sustainable design and construction techniques?

Table C-13: Site impact matrix on SA Objective 12 - Water Resources.

| Site ref. | Watercourse | Groundwater Source Protection Zones |
|-----------|-------------|-------------------------------------|
| 1146      | 0           | 0                                   |
| 1135      | 0           | 0                                   |
| 1141      | 0           | 0                                   |
| 1148      | 0           | 0                                   |
| 1133      | 0           | 0                                   |
| 1137      | -           | 0                                   |
| 1122      | 0           | 0                                   |
| 29        | 0           | 0                                   |

#### Watercourse

There are several minor and major watercourses across the district. As outlined by Lepus Consulting within the Regulation 18 SA, sites have been assessed for their proximity (within 200m) to a watercourse.

Site 1137 is located within 200m of a watercourse and therefore, proposed development at this site could potentially increase the risk of contamination of the watercourse during construction and operation. A minor negative impact on watercourse quality can be expected.

Sites 1122, 1133, 1141, 1135, 1146, 1148 and 29 are located outside a 200m buffer of a watercourse therefore, a negligible impact is assessed.

#### Groundwater Source Protection Zones (SPZ)

None of the proposed sites coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. Proposed development of these sites could therefore be expected to have a negligible impact on protected groundwater resources.

### C.3.13 SA Objective 13 - Economic Regeneration

SA Objective 13 is to encourage the regeneration and prosperity of the district’s existing Town Centres and support the viability and vitality of village and neighbourhood centres. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Protect key retail areas?
- Encourage rural diversification?
- Make land available for business development?
- Increase the range of employment opportunities, shops and services available in the town centres across the district?
- Decrease the number of vacant units in town centres?
- Enhance the viability and vitality of the district’s town centres?
- Improve access to the district’s town centres and services?
- Enhance the local distinctiveness in the town centres?
- Provide new or improved leisure, recreational or cultural activities?
- Maintain or increase the amount of floorspace provided for town centre uses within the town centres?

Table C-14: Site impact matrix on SA Objective 13 - Economic Regeneration.

| Site ref. | Pedestrian Access to Local Services | Public Transport Access to Local Services |
|-----------|-------------------------------------|---|
| 1146      | -                                   | -   |
| 1135      | -                                   | -   |
| 1141      | -                                   | -   |
| 1148      | -                                   | -   |
| 1133      | -                                   | -   |
| 1137      | -                                   | +   |
| 1122      | +                                   | +   |
| 29        | -                                   | -   |

#### Pedestrian Access to Local Services

Access to local services including supermarkets, town centres or a high street shopping centre, can result in economic stimulation and regeneration. Increases in footfall could positively impact the local economy and provide opportunities for residents. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these proposed sites is expected to have a minor negative impact on accessibility.

### Public Transport Access to Local Services

As outlined by Lepus Consulting within the Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey on public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on accessibility.

Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on accessibility.

### C.3.14 SA Objective 14 - Economic Growth

SA Objective 14 is to promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Improve business development and enhance competitiveness?
- Improve the resilience of business and the economy?
- Promote growth in key sectors?
- Reduce out commuting?
- At least maintain and possibly improve employment rate across the district?
- Increase the range of employment opportunities?
- Facilitate the provision of good quality infrastructure to promote economic growth?

Table C-15: Site impact matrix on SA Objective 14 - Economic Growth.

| Site ref. | Employment floorspace | Access to Primary Employment Locations |
|-----------|-----------------------|--|
| 1146      | 0                     | +                                      |
| 1135      | 0                     | +                                      |
| 1141      | 0                     | +                                      |
| 1148      | 0                     | +                                      |
| 1133      | 0                     | +                                      |
| 1137      | 0                     | +                                      |
| 1122      | 0                     | +                                      |

| Site ref. | Employment floorspace | Access to Primary Employment Locations |
|-----------|-----------------------|--|
| 29        | 0                     | +                                      |

### Employment floorspace

All of the additional proposed sites are for residential use only and as a consequence are likely to have a negligible impact on economic growth through employment floorspace provision.

### Access to Primary Employment Locations

There is a number of employment locations within the district within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. As outlined by Lepus Consulting within the Regulation 18 SA, the target distance to key employment areas has been assessed as 5km from proposed sites.

All of the proposed sites are located within this target distance, therefore a minor positive impact on the local economy could be expected following development.

# D Appraisal of Reasonable Alternative Sites Post-Mitigation in the Mid Sussex District Plan Review 2021 - 2039

## D.1 Introduction

As outlined in the Regulation 18 SA by Lepus Consulting, the process of appraising reasonable alternative sites has been separated into two distinct stages. The first stage of assessment assesses the potential impacts of the proposed sites on the SA Framework outlined in Section 3.2, prior to consideration of any mitigation measures.

The second phase of assessment reviews the potential impacts identified at stage one, in light of any likely relevant mitigation contained within the emerging policies. The purpose of this stage is to identify the potential adverse impacts which would need to be overcome for sustainable development of a site.

The following post mitigation assessment draws upon that completed by Lepus Consulting at Regulation 18 within the Regulation 18 SA. Table D-1 to Table D-13 below have been updated to reflect all potential adverse effects identified within the site assessment against each SA objective. Relevant policies have been outlined which may mitigate potential adverse effects identified either cumulatively or on their own.

## D.2 Pre-Mitigation Assessment

A total of 8 additional reasonable alternative sites have come forward since the Regulation 18 DPR and have been assessed in this Regulation 19 SA. These assessments are presented in Appendix C of the Regulation 19 SA Report. Table 6-2 in Section 6 represents the pre-mitigation impacts identified for each of the 8 additional reasonable alternative sites. Where an SA objective has multiple sub-objectives with differing likely impacts, the modal score has been taken across the sub-objective results for each of the new sites. Where there is no clear modal value, a worst-case scenario has been adopted to capture potential adverse impacts.

The pre and post mitigation assessment findings identified for all reasonable alternative sites assessed at Regulation 18 by Lepus Consulting have also been included. It was unclear from the Regulation 18 SA which methodology was applied to calculate the overall score for each SA objective. The overall scores for each site following the pre-mitigation assessment undertaken at the Regulation 18 stage has therefore been updated to reflect this use of a modal score for consistency.

## D.3 Mitigating effects of draft policies

The sustainable appraisal of eight additional alternative site allocations against baseline sustainability information has identified a number of potential adverse effects associated with the SA Objectives in the SA Framework (Table 3-6). The purpose of this chapter is to



consider if and how effects can be mitigated through policies in the emerging Regulation 19 District Plan.

Table D-1 to Table D-13 highlight the identified potential adverse impacts according to SA Objectives and lists the policies from the draft Regulation 19 District Plan that might reasonably be expected to help mitigate identified adverse effects. Table D-1 also considers the cumulative impact of sites and policies together.

Each table has three columns; the first listing the potential adverse effects identified, the second outlining relevant planning policies and final column indicating the extent to which these policies would be expected to mitigate each of the identified potential adverse effects.

#### D.4 SA Objective 1 - Housing

No adverse impacts are anticipated as a result of the proposed development at any of the additional reasonable alternative sites.

#### D.5 SA Objective 2 - Health and Wellbeing

Table D-1 presents the identified adverse impacts on health and wellbeing, and likely impacts.

Table D-1: Identified adverse impacts and potential mitigation for SA Objective 2 - Health and Wellbeing post-mitigation.

| Identified adverse impact                                 | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
| <p>Limited access to emergency and routine healthcare</p> | <p>Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Health'.<br/>                     Policy DPI2 could help to ensure that impacts of development on infrastructure, including healthcare and community facilities and services, are mitigated through setting out the process of planning obligations. Policy DPI2 also states that financial contributions should be made to 'emergency services'.<br/>                     Various policies including DPS6, DPB1, DPT1, DPT3, DPH3, and DPH12 could help to ensure new residents have good access to public transport to reach community facilities.<br/>                     As outlined under Policy DPS6: Health and Wellbeing, all proposals for major development will be required to undertake Health Impact Assessment screening to identify potential health impacts and ensure future health and</p> | <p>These policies would be likely to improve site end users' access to healthcare; however, the policies would not be expected to fully mitigate the existing restricted access to these services in all locations, especially in terms of providing sustainable connections for rural areas of Mid Sussex to NHS hospitals.</p> |

| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|--|---|---|
|  | wellbeing needs are met.  |   |
| <p>Limited access to leisure facilities impacting health and wellbeing</p> | <p>Most of the site allocations state financial contributions should be made for 'open space and leisure', 'outdoor sports', 'other outdoor provision' and 'sports facilities'.</p> <p>Policy DPI5 sets out standards for provision of new open space, sports and recreational facilities alongside new developments and as stand-alone developments.</p> <p>Policy DPI6 outlines the need to protect and maintain existing community facilities, with support for new facilities.</p> <p>Policy DPE8 supports leisure and tourism related development within rural areas which would likely improve access for residents living in those areas.</p> <p>Policy DPN3 seeks to protect and enhance areas of greenspace through green infrastructure provision.</p> <p>Policies DPI1 and DPI3 would be expected to protect leisure facilities through ensuring major infrastructure developments protect existing facilities serving the community.</p> <p>Site allocation policy DPA3 (site 1123) seeks to orientate development positively to address existing open space at Queens Park Crescent along with any proposed areas of open space.</p> | <p>These policies would be likely to improve access to leisure facilities for development proposals within or in the outskirts of settlements which contain existing leisure centres. However, these policies would not be expected to fully mitigate the existing restricted access to these services for residents of more rural areas within Mid Sussex.</p> |
| <p>Limited access to, and the net loss of greenspace</p>                   | <p>Most site allocations include 'natural, semi-natural and amenity greenspace' on site.</p> <p>Policy DPI5 seeks to ensure that existing open space with recreational value is protected from development and sets out standards for new open space provision alongside new developments.</p> <p>Policy DPC6 sets out criteria for the contribution to provision of Suitable Alternative Natural Greenspace (SANG) for recreational use with the aim of reducing recreational impacts at</p>   | <p>These policies would be expected to mitigate the limited access to public greenspace and community open spaces and ensure that no existing green space with public value is lost to development. These policies would also seek to promote creation of publicly accessible green space (where appropriate).</p>  |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact? |
|---------------------------|--|---|
|                           | <p>Ashdown Forest SPA and SAC.</p> <p>Policy DBP1 seeks to ensure that developments incorporate greenspace into the overall character and design of proposals.</p> <p>Policy DPS6: Health and Wellbeing outlines that all new development must provide high quality outdoor space and publicly accessible open and green space (where applicable for the type of development proposed).</p> <p>Site allocation policy DPA4 (site 198) outlines a commitment to provide a link to the existing Sunnyside Recreation Ground.</p> |   |

| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|--|---|--|
| <p>Increase in, and exposure to, air and noise pollution from Main Roads and AQMAs</p> | <p>Policy DPN9 wholly regards air pollution within the Plan area and seeks to reduce exposure to areas of poor air quality and sets out the requirement for Air Quality Assessments for major developments within or in close proximity to an AQMA. The policy also sets out requirements for air quality mitigation measures and to ensure developments make positive contributions towards the aims of the Council's Air Quality Action Plan.</p> <p>Policy DPN6 seeks to ensure development does not cause adverse effects from pollution including air and noise.</p> <p>Policy DPN7 outlines that development would be expected to be located, designed and controlled to avoid significant adverse impacts or minimise adverse impacts from noise.</p> <p>Several of the policies, including Policy DPT1, seek to prioritise sustainable and active modes of travel which would contribute towards a reduction in traffic-related emissions.</p> <p>Policy DPB1 promotes high quality design of new developments which aim to ensure the development does not result in, or is exposed to, excessive noise pollution.</p> <p>Site allocation policy DPA7 (site 556) and DPA15 (site 1020), DPA17 (site 784) and DPA19 (site 1106) outlines a commitment to provide good acoustic design to address noise impacts associated with the railway.</p> | <p>These policies would likely reduce adverse effects but would not be expected to fully mitigate the impacts of transport associated emissions and noise pollution from new development proposals located near the AQMA or main road.</p> |
| <p>Limited access to the PRoW or cycle network</p>                                     | <p>Policy DPT2 and DPT3 recognises the importance of maintaining and enhancing the existing PRoW and other recreational routes. In particular, DPT2 states that new development will be required to take full account of existing provision of PRoW and does not adversely affect a route without replacing with an equivalent route.</p>   | <p>These policies would not be expected to mitigate the potential adverse impacts on limited access to PRoW or cycle network. However, several site allocation policies will seek to integrate and</p>                                     |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?                            |
|---------------------------|--|--|
|                           | Several site allocation policies including seek to integrate and/or enhance the existing PRowWs that cross the site to improve connectivity. | enhance existing PRowWs which cross the site to improve connectivity where possible. |

The policies in the DPR are likely to have a cumulative positive impact on residents' access to greenspace, leisure activities, and facilities which support the community. For example, Policy DPI5 sets out standards for new open space and recreational facilities while Policy DPE8 supports leisure related development, and Policies DPI1, DPI3 and DPI6 seek to protect existing leisure and community facilities. However, these policies will perform better near urban centres and would not be expected to fully mitigate the existing restricted access to these services for residents of more rural areas within Mid Sussex.

## D.6 SA Objective 3 – Education

Table D-2 presents the identifies adverse impacts on education and the likely impacts post-mitigation.

Table D-2: Identified adverse impacts and potential mitigation for SA Objective 3 - Education post-mitigation.

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?  |
|---|--|--|
| Limited access to primary, secondary and further educational facilities | Sustainable community allocations DPSC1-DPSC7 include land for education provision and library services on site. Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Education' and 'Library'. Policy DPS6 seeks to improve access to education where opportunities arise. Policy DPI2 could help to ensure that impacts of development on infrastructure, including education, are mitigated through setting out the process of planning obligations. Policy DPH10 outlines the criteria in which rural exception sites should meet in order to be deemed sustainable, including | These policies would improve sustainable transport provision and ensure that major developments are located within reasonable walking distances to primary education, however, these policies would not be expected to fully mitigate adverse impacts on poor accessibility to education in all locations in this largely rural district, particularly in relation to providing sustainable access to secondary schools. Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances to reach secondary |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?   |
|---------------------------|--|---|
|                           | <p>being ideally located in close proximity to a primary school.</p> <p>Policy DPI6 supports the provision or improvement of community facilities in order to create sustainable communities, including educational facilities.</p> <p>Policy DPH5 seeks to ensure that sites proposed for Gypsy and Traveller accommodation are in a reasonably accessible location to educational facilities.</p> <p>Site allocation DPSC7 includes provision for relocation of the Special Educational Needs and Disabilities (SEND) school.</p> <p>Site allocation policy DPA14 (site 1120) outlines a commitment to explore opportunities on-site to enhance education provision in the village to meet local need.</p> | <p>education, such that not all pupils will be within walking distance.</p> <p>The development of new and expanded schools on 'significant sites' identified in the DPR would improve access by locating site-end users in closer proximity to primary education or increasing capacity at existing schools.</p> <p>Overall, assuming that most journeys to secondary schools would be by sustainable transport modes as advocated by the DPR policies, such as public transport or school buses, the policies would be expected to reduce the potential for negative impacts associated with accessibility to education.</p> |

Policies specifically related to a site are, on the most part, likely to lead to beneficial effects for that development. However, the cumulative effect of other policies within the plan are unlikely to lead to a beneficial impact on SA Objective 3, particularly for sites in rural locations, where education provision is supported but not necessarily committed to. Nonetheless, various policies including DPS6, DPB1, DPT1, DPT3, DPH3, and DPH12 could help to ensure new residents have good access to public transport to reach community facilities which would have a beneficial impact on the education objective.

#### D.7 SA Objective 4 - Community and Crime

Table D-3 presents the identified adverse impacts on education and the likely impacts post-mitigation.

Table D-3: Identified adverse impacts and potential mitigation for SA Objective 4 - Community and Crime post-mitigation.

| Identified adverse impact    | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?                             |
|------------------------------|--|---|
| Limited access to or loss of | Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Community buildings' and 'local community | Although these policies are likely to improve access to local services and facilities |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---------------------------|---|---|
| community facilities      | <p>infrastructure'.</p> <p>Policy DPI6 seeks to support the provision or improvement of community and cultural facilities and local services and outlines the contribution requirements for new residential development regarding these facilities. The policy would also resist the loss of existing community or cultural facilities, unless there is objective evidence that the service is surplus to requirement.</p> <p>Policy DPI2 regards the planning obligations for new developments in relation to the provision of these facilities.</p> <p>Policy DPI5 regards the protection and provision of open space, sport and recreational facilities and would be expected to improve access to these facilities.</p> <p>Policy DPE4 supports development within a defined town or village centre and would be expected to improve access to local services. The policy also seeks to reduce impacts of retail developments outside of these centres through retail impact assessments.</p> <p>Various policies including DPT1 would be expected to improve access to local services through improvements to sustainable transport provision or enhancement.</p> <p>Policy DPA3 (site 1123) outlines a commitment to delivering compensatory community allotments through site allocation policy DPA3a.</p> | <p>and help promote community cohesion, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations (assessed as those over 150m from a defined Built-up Area Boundary, in agreement with MSDC).</p> <p>The policies would however be expected to mitigate the potential loss of existing community facilities.</p> |

Given the range of policies promoting access to services and facilities across the range of policy themes, it is considered that overall, there will be a cumulative positive effect in relation to SA Objective 4. However, sites which are located in the more rural areas would be more likely to be dependent on the financial contributions for local community infrastructure and outdoor space in their related policy. Further planning considerations may be required for those sites without a related policy.

## D.8 SA Objective 5 - Flooding

Table D-4 presents the identified adverse impacts on flooding and the likely impacts post-mitigation.

Table D-4: Identified adverse impacts and potential mitigation for SA Objective 5 - Flooding post-mitigation.

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---------------------------|---|---|
| Risk of fluvial flooding  | <p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of fluvial flooding or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach. This would seek to ensure that sites are located in appropriate areas, considering flood risk from all sources. This policy requires developers to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPN3 seeks to ensure that development proposals make contributions to green and blue infrastructure networks.</p> <p>Policy DPS2 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.</p> <p>Site allocation policy DPA7 (site 556), DPA14 (site 1120) and DPA18 (site 1101) outlines a commitment to follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.</p> | <p>These policies would not be expected to fully mitigate risk of fluvial flooding within proposed development sites where the entirety or much of the area coincides with high-risk areas (Flood Zone 3).</p> <p>However, as outlined under Policy DPS4, development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with the NPPF.</p> |



| Identified adverse impact             | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---------------------------------------|---|---|
| <p>Risk of surface water flooding</p> | <p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of flooding. including surface water flooding, or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach to ensure that the appropriate uses are located in areas at greater flood risk from all sources. This policy requires development to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPN3 the protection and provision of blue infrastructure such as vegetated SuDS.</p> <p>Site allocation policies DPA7, DPA9, DPA10 and DPA12 should help integrate SuDS in new development.</p> <p>Site allocation policy DPA7 (site 556), DPA14 (site 1120) and DPA18 (site 1101) outlines a commitment to follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.</p> | <p>These policies would not be expected to fully mitigate risk of surface water flooding within proposed development sites which are at high risk of surface water flooding.</p> <p>However, as outlined under Policy DPS4, development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with the NPPF. This would seek to mitigate the risk of surface water flooding and prevent the exacerbation of surface water flood risk in surrounding areas.</p> |

These policies would not be expected to fully mitigate risk of surface water flooding within proposed development sites which are at high risk of fluvial or surface water flooding. However, Policy DPS4 alongside Policy DPS2 will ensure development is of sustainable construction with appropriate blue infrastructure and SUDS which would lead to an overall beneficial impact on SA Objective 5.

#### **D.9 SA Objective 6 - Natural Resources**

Table D-5 presents the identified adverse impacts on natural resources and the likely impacts post-mitigation.

Table D-5: Identified adverse impacts and potential mitigation for SA Objective 6 - Natural Resources post-mitigation.

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---|---|---|
| <p>Loss of previously developed land and loss of Best and Most Versatile Soil</p> | <p>Policy DPN10 supports the remediation of contaminated land.</p> <p>Policy DPC1 supports the projection of countryside by minimising the land taken for development and states that BMV soil should be protected from development.</p> <p>Policy DPN1 recognises the importance of soils and outlines a commitment to their protection and enhancement by avoiding development on BMV soil.</p>   | <p>Most additional development sites in Mid Sussex comprise previously undeveloped land.</p> <p>These policies would not be expected to fully mitigate the loss of previously developed land. However, it is anticipated that Policy DPC1 and DPN1 should provide some protection to BMV soils.</p> |
| <p>Sterilisation of mineral resources within Mineral Safeguarding Areas</p>       | <p>Policy DPC1 sets out that any development located within a Mineral Safeguarding Zone must consult the Minerals Planning Authority to identify whether minerals are accessible in sufficient amounts to be economically viable to extract.</p> <p>Site allocation policy DPA15 (site 1020) outlines a commitment to address any impacts with the Building Stone (Cuckfield and Ardingly) Minerals Consultation Area.</p> <p>Site allocation policy DPA4 (site 198), DPA13 (site 984), DPA14 (site 1120) and DPA18 (site 1101) outlines a requirement for consideration of the potential for mineral sterilisation in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.</p> <p>Site allocation policy DPA12 (site 13) outlines a commitment to address any impacts associated with Mineral Safeguarding Areas.</p> | <p>This policy seeks to prevent the sterilisation of mineral resources from development. This policy would be expected to ensure that safeguarded minerals are protected or extracted prior to development where possible.</p>  |

Policy DPC1 and the site allocation policies within mineral safeguarding areas are likely to prevent the sterilisation of mineral resources in the District. However, it is not expected that the policies would prevent the development of undeveloped land or fully prevent the development on BMV soil. Overall, the policies would cumulatively not have a significant impact on mitigate adverse impacts under SA Objective 6.

### D.10 SA Objective 7 - Biodiversity and Geodiversity

Table D-6 presents the identified adverse impacts on biodiversity and likely impact post-mitigation.

Table D-6: Identified adverse impacts and potential mitigation for SA Objective 7 - Biodiversity and Geodiversity post-mitigation.

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---|---|---|
| Threats or pressures to Habitat sites (SAC, SPA and Ramsar sites) | Policy DPN1 to DPN4 sets out a series of requirements for new developments regarding designated ecological sites including demonstrating the implementation of the mitigation hierarchy. Policy DPC6 refers directly to Ashdown Forest SPA, and the requirement of development to demonstrate adequate measures are put in place to avoid or mitigate any potential adverse effects where likely. | At the time of writing, a Habitats Regulations Assessment (HRA) is being produced which would consider the potential for likely significant impact on internationally important habitat sites. The HRA found that no adverse effects both alone and in combination can be expected. |
| Threats or pressures to nationally designated sites (SSSIs)       | Policy DPN1 to DPN4 sets out a series of requirements for new developments regarding designated ecological sites including demonstrating the implementation of the mitigation hierarchy.  | The policy would be expected to mitigate potential impacts of development on SSSIs. At this stage, there remains the potential for some residual effect which would require consideration in future planning stages.  |
| Threats or pressures to ancient woodland and veteran trees        | Policies DPN1 and DPN4 identify the importance of ancient woodland and veteran trees and their contribution to irreplaceable habitats and complex ecological conditions. Several allocation policies including DPSC1, DPSC5, DPSC7, DPA4, DPA9 and DPA10 seek to address any impacts associated with areas of   | These policies would be expected to contribute to the protection of ancient woodland and veteran trees. However, there is still potential for adverse impacts on ancient woodlands and veteran trees.   |

| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|--|---|--|
|  | <p>ancient woodland and ensure their exclusion from development, e.g., through an appropriate buffer.</p> <p>Site allocation policy DPA16 (site 1148) outlines a commitment to retain and provide an appropriate buffer to the mature English oak tree in the centre of the site unless it can be demonstrated and justified through survey and assessment evidence that it requires removal.</p>   | <p>It is anticipated that further consideration would be required in future planning stages.</p>   |
| <p>Threats or pressures to locally designated sites and non-designated sites including priority habitats</p> | <p>Policies DPN1 to DPN4 recognises the need to avoid indirect harm and damage to existing areas of locally designated sites and priority habitats. The policies outline the need for development proposals to deliver biodiversity net gain.</p> <p>Site allocation policies including DPA4, DPA13 and DPA19 outline that an appropriate buffer will be provided for priority habitat (deciduous woodland) within the site.</p> <p>Site allocation policy DPA1 (site 573) outlines that development must provide a positive edge to Batchelors Farm Nature Reserve to the west.</p> <p>Site allocation Policy DP17 (site 784) outlines that particular attention should be given to trees and hedgerows on the southern boundary adjacent to the PRow.</p> | <p>These policies would make a positive contribution to protecting designated and non-designated biodiversity assets. However, degradation of priority habitat would be anticipated with the development of some sites.</p> <p>It is anticipated that further consideration would be required in future planning stages.</p> |
| <p>Loss / degradation of GI and ecological networks</p>  | <p>Policies DPN1 to DPN4 recognises the need to avoid indirect harm and damage to ecological networks. DPN2 requires all developments to deliver biodiversity net gain.</p> <p>Policy DPN sets out the requirement of development to provides new green blue infrastructure integrated into design and contributes to wider blue green infrastructure development.</p>  | <p>These policies would be expected to mitigate potential negative ecological impacts associated with development as they ensure that development contributes to the creation, enhancement and protection of Mid Sussex's Green Infrastructure network</p>   |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies | Will the policies mitigate the identified adverse impact? |
|---------------------------|--|---|
|                           |  | and ecological assets including biodiversity net gain.    |

Given the range of policy provision across the policies which encompass nature conservation, the delivery of biodiversity net gain, the creation of ecological corridors, and the range of associated effects that are predicted, it is considered that overall, there will be a beneficial cumulative impact from development on SA Objective 7.

### D.11 SA Objective 8 - Landscape

Table D-7 presents identified adverse impacts on landscape and the likely impacts post-mitigation.

Table D-7: Identified adverse impacts and potential mitigation for SA Objective 8 - Landscape post-mitigation.

| Identified adverse impact                     | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?   |
|---|--|---|
| Effects on the setting of the High Weald AONB | <p>Policy DPC4 refers directly to AONB and the requirement for development to conserve and enhance its qualities. Policy DPC1 aims to protect and enhance the countryside and seeks to ensure that development proposals are informed by the local landscape. Policies DPC3 and DPB1 include the criteria for developments to meet including those located within the High Weald AONB.</p> <p>Site allocation policy DPA7 (site 556) outlines a commitment to containing development to central and eastern parts of the site to reduce potential impacts on the setting of High Weald AONB. This will be informed by a Landscape and Visual Impact Assessment (LVIA).</p> <p>Site allocation policy DPA19 (site 1106) outlines a commitment to outline a building design that is appropriate for the location on the edge of a settlement and in the High Weald AONB.</p> | <p>Identified adverse impacts on the setting of the High Weald AONB from development proposals would be expected to be mitigated by these policies. However, a level of uncertainty remains as to the potential for adverse impacts arising from Sites 198, 984 and 1106 which are located within the AONB and are identified as having the potential to have a 'moderate' adverse impact on the character of the landscape. As such, these policies would not be expected to fully mitigate adverse impacts at these sites.</p> <p>It is anticipated that further consideration would be required in future planning stages (such as undertaking an LVIA).</p> |

| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?  |
|--|--|--|
| <p>Effects on the setting of the South Downs National Park</p>                             | <p>Policy DPC5 refers directly to the impact of development on the setting of the South Downs National Park. The policy states that development proposals will only be permitted where they do not detract from, or cause detriment to the visual and species qualities, tranquillity, and essential characteristics of the National Park. Developments must also consider and address potential impacts on roads within the National Park and or in the setting of the National Park.</p> <p>DPB1 promotes high quality design and seeks to make positive contributions to the landscape and respond appropriately.</p> <p>Policy DPC1 aims to protect and enhance the countryside and ensures that development proposals, to be supported, are informed by landscape character assessment.</p> <p>Site allocation policies included reflect the requirements of DPC5 to minimise visual impacts on the National Park by ensuring that the scale, setting and design of the development avoids harm to its character.</p> <p>Site allocation Policy DPA18 (site 1101) outlines a requirement for building design to be appropriate to the site's edge of the settlement location and address any sensitive views from within the South Downs National Park,</p> | <p>Identified adverse impacts on the setting of the South Downs National Park from development proposals would be expected to be mitigated by these policies. However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals or Sites 13, 19, 575, 799, 986, 1022, 1095 and 1105 which are located in close proximity to the South Downs National Park and some of these sites comprise significantly large areas of undeveloped land. As such, these policies may not fully mitigate adverse impacts at these sites.</p> <p>It is anticipated that further consideration would be required in future planning stages.</p> |
| <p>Threaten or result in the loss of rural and locally distinctive landscape character</p> | <p>There are policies which would be expected to ensure that development proposals consider landscape character including policies DPC1 to DPC6 and building design requirements set out by DPB1 to DPB4.</p> <p>Policies DPH1 and DPH2 regard sustainable development within and outside of built-up areas.</p> <p>Site allocation policy DPA5 (site 858)</p>   | <p>These policies would help to mitigate adverse impacts on the landscape character arising from the proposed development to some extent. However, some sites are identified as being of low to negligible capacity for residential development. These policies are not</p>  |

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
|   | and DPA6 (508) outlines a commitment to respecting, retaining and enhancing the rural character of Hurstwood Lane and any unavoidable loss of trees required for access should be justified.  | expected to fully mitigate the potential impacts on landscape character in Mid Sussex and there remains the potential for minor adverse impacts.   |
| Development threatens area of high landscape sensitivity/capacity | <p>Policies DPC1 to DPC6 and DPB1, would be expected to contribute towards the protection of sensitive landscapes from development pressures.</p> <p>Policy DPC2 works in collaboration with DPC1 to prevent development which may harm separate identity of settlements.</p> <p>Site allocation policies seek to comply with the above policies through inclusion of necessary measures to mitigate the impact of development on the landscape character of the surrounding area (including a landscape buffer on the site boundary at site 858).</p> <p>Site allocation policy DPA13 (site 984) and DPA18 (site 1106) includes a commitment to take a landscape-led approach to development and take into account existing trees in design.</p> | <p>These policies could help reduce adverse impacts on sensitive landscapes. However, it is unlikely an adverse impact on landscape capacity could be mitigated as areas of high landscape sensitivity are unable to accommodate development without minor adverse impact on landscape character.</p> <p>It is anticipated that further consideration would be required in future planning stages.</p> |
| Impacts on Country Parks  | <p>Although no policies directly refer to the protection or enhancement of country parks and their setting, various policies including DPB1, DPN3 and DPH4 could help to reduce adverse impacts by ensuring development proposals are of high-quality design, well-related to their surroundings and incorporate GI.</p> <p>Site allocation policy DPA14 (site 1120) outlines a commitment to provide a country park between north and south development parcels.</p>   | <p>There are several Country Parks located across the district. None of the proposed sites are located within or in proximity to a Country Park.</p> <p>District plan policies would be expected to mitigate identified adverse impacts on Country Parks.</p>  |

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?   |
|---|--|---|
| Change in views experienced by users of PRow network/ local residents | <p>Policies DPB1 to DPB3 outlines design principles which will be treated as a material consideration in the assessment of planning schemes.</p> <p>Site allocation DPA17 seeks to maintain the rural character of the PRow on the southern boundary of the site.</p> <p>Site allocation DPA14 (site 1120) outlines a commitment to retain the character of the footpath which runs along the sites' northern boundary and create a pedestrian link from the site.</p> | These policies are unlikely to mitigate the impact of development on views experienced by users of the PRow network and local residents.  |
| Increase risk of coalescence/ urban sprawl                            | <p>Policy DPC2 seeks to prevent coalescence of settlements to maintain separate identities of individual towns and villages within the Plan Area.</p> <p>Policies DPB1 and DPN3 seeks to promote high quality design and integration of green blue infrastructure amongst development proposals.</p> <p>These policies may help mitigate some negative impacts associated with new development and limit impacts associated with urban sprawl.</p>                     | These policies may help to reduce some of the negative impacts associated with integration of new development into the countryside. However, due to the rural context in which some of the new development is situated, the policies would not be expected to fully mitigate these impacts. |

Given the range of landscape protection provided across the range of proposed policies, it is considered that overall, there will be a minor beneficial cumulative effect in relation to SA Objective 8. However, due to the scale of the developments it is unlikely that the policies will be able to fully mitigate adverse impacts on landscape character across the District.

### D.12 SA Objective 9 - Cultural Heritage

Table D-8 presents identified adverse impacts on cultural heritage post-mitigation.

Table D-8: Identified adverse impacts and potential mitigation for SA Objective 9 - Cultural Heritage post-mitigation.

| Identified adverse impact                             | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
| Potential direct impact on heritage assets (including | Policies DPB1 to DPB3 outlines design principles which will be treated as a material consideration in the assessment of planning schemes. | These policies would be expected to mitigate some potential negative impacts on character and setting of |



| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?  |
|--|--|--|
| <p>Listed Buildings, Scheduled Monuments and Conservation Areas)</p> | <p>These policies particularly focus on design of development within the setting of heritage assets.</p> <p>Policy DPS2 outlines that where proposals could impact existing heritage assets, they will be required to demonstrate how any alteration will preserve their significance, in line with the NPPF.</p> <p>Site allocation policies DPSC1, DPSC2, DPSC3, DPSC5, DPA7, DPA8, DPA10 and DPA14 require that prior to the development of sites 740, 18, 799, 601, 556 1121, 743 and 1120 respectively, a Heritage Statement must be produced to inform the layout and design of the development to preserve the Grade II Listed Buildings present.</p> | <p>heritage assets. However, at this stage there is still the potential for adverse impacts to occur as the result of development.</p> <p>It is anticipated that further consideration would be required in future planning stages</p> |

| Identified adverse impact  | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?  |
|--|--|--|
| <p>Alteration of character or setting of heritage asset (including Listed Buildings, Scheduled Monuments and Conservation Areas.</p> | <p>Policy DPB2 specifically references the protection of Listed Buildings and other heritage assets within the Plan area. Policy DPB3 outlines criteria for proposed developments within Conservation Areas.</p> <p>Policy DPB1 sets out various criteria to achieve high-quality design including conservation of cultural and heritage assets and their settings.</p> <p>Policy DPN5 seeks to protect the character appearance and setting of a registered park or garden.</p> <p>Policy DPC4 regards the conservation of the High Weald AONB historic landscape features including the conservation of cultural heritage assets.</p> <p>Site allocation policies DPSC1, DPSC2, DPSC3, DPSC5, DPA7, DPA8, DPA10 and DPA14 require that prior to the development of sites 740, 18, 799, 601, 556 1121, 743 and 1120 respectively, a Heritage Statement or Heritage Impact Assessment must be produced to inform the layout and design of the development to preserve the Grade II Listed Buildings present.</p> | <p>These policies would be expected to mitigate potential negative impacts on the character and setting of heritage assets arising from development proposals in close proximity to heritage assets. However, the potential impacts of development on heritage assets depends on the detailed nature of the proposals and how these changes may affect the significance of the heritage asset. At this stage of the planning process, there remains the potential for adverse impacts on settings on heritage assets as a result of development at the following sites: 13, 18, 575 and 799.</p> <p>It is anticipated that further consideration would be required in future planning stages (such as through undertaking a Heritage Statement or Heritage Impact Assessment).</p> |
| <p>Alteration of character or setting of archaeological features</p>   | <p>Policy DPB2 outlines that any proposed development must undertake a pre-determination evaluation of archaeological potential and appropriate mitigation will be required depending on the outcome.</p> <p>Site allocation policy DPA3a outlines that since part of the allotment site is within an Archaeological Notification Area, pre-determination evaluation of potential archaeological features on site will be required prior to any planning application being submitted.</p> <p>Site allocation policy DPA9 (site 688) outlines that assessment of areas of</p>   | <p>This policy would not be expected to mitigate impacts to archaeology without greater understanding of significance of assets and potential for undiscovered below ground assets. At this stage of the planning, it is uncertain how development would impact the historic environment.</p> <p>It is anticipated that further consideration would be required in future planning</p>   |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies | Will the policies mitigate the identified adverse impact?                |
|---------------------------|--|--|
|                           | archaeological interest must be undertaken.                    | stages (such as through assessment of areas of archaeological interest). |

Eight policies specifically incorporate controls on new development proposals, requiring development to assess its impact on the historic environment, and provide appropriate mitigation or demonstrate that it will not have an unacceptable adverse effect. Several site allocation policies require development proposals to include Heritage Impact Assessments. However, it is anticipated that further consideration and detail would be required in future planning stages for the sites and the policies alone do not fully mitigate adverse impacts on the historic environment.

### D.13 SA Objective 10 - Climate Change and Transport

Table D-9 presents identified adverse impacts on climate change and transport post-mitigation.

Table D-9: Identified adverse impacts and potential mitigation for SA Objective 9 - Climate Change and Transport post-mitigation.

| Identified adverse impact                             | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
| Generation of carbon emissions from increased traffic | Policy DPS1 seeks to reduce carbon emissions through embedding the principles of local living and prioritise active travel and sustainable transport. Policy DPT2 and DPT3 and refer to the provision of active travel provision. All site allocation policies will be required to contribute to active travel provisions and access to sustainable travel.<br>Site allocation DPA3 (site 1123) commits to delivering a transport mobility hub which prioritises sustainable and active travel. | Whilst these policies seek to reduce current carbon emissions within the Plan area, it is unlikely these policies would fully mitigate the impacts from new development on traffic related carbon emissions. |

| Identified adverse impact                                | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|--|---|--|
| <p>Limited access to bus services and train stations</p> | <p>DPT3 refers to the requirement of developments to ensure they provide an environment which makes active and sustainable travel an easy and attractive choice. Several other policies refer to the provision and access to sustainable transport.</p> <p>All site allocation policies reference provision of or financial contribution to sustainable transport measures and provision.</p> | <p>These policies would not improve access to train stations. Other policies may contribute to the improvement of bus services; however, this cannot be fully mitigated.</p> |
| <p>Limited access to local services and facilities</p>   | <p>Policies DPT1 to DPT3 refer to the delivery of 20-minute neighbourhoods and the consideration of development proposals in relation to the location of services.</p> <p>Site allocation policies DPSC1, DPSC2 and DPSC3 include on-site provision of local services. Policies DPSC4, DPSC5, DPSC6 and DPSC7 include financial contribution towards the provision of local services.</p>     | <p>These policies would be expected to improve access to local services and facilities.</p>  |

| Identified adverse impact                     | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
| <p>Lack of safe pedestrian / cycle access</p> | <p>Policies DPT2 and DPT3 support protection and enhancement of PRow, recreational routes and cycleways through new development which should link to the existing cycle and pedestrian network.</p> <p>Various other policies, including DPS1, DPB1, DPT1 encourage proposals to explore opportunities for integrating PRow, footpaths, bridleways and cycle routes into current networks to improve connectivity.</p> <p>Site allocation policy DPSC GEN requires all development allocation sites to provide a layout that prioritises sustainable and active modes of travel, providing safe and convenient routes for walking, wheeling and cycling through the development and linking with existing and enhanced networks beyond.</p> <p>Site allocation policies DPA1 (site 573), DPA2 (1030), DPA5 (858), DPA6 (508), DPA8 (1121) outline a commitment to prioritise cycle and pedestrian connections through the site.</p> <p>Site allocation policy DPA12 (site 13) and DPA15 (site 1020) outlines a commitment to create new pedestrian and cycle links to connect to the existing PRow network.</p> <p>Site allocation policy DPA14 (site 1120) provides a commitment to provide pedestrian and cycle access to The Street into the north part of the site between properties of Westmeadow and Download.</p> | <p>These policies would be expected to mitigate adverse impacts on accessibility to PRow and cycle networks for several of the proposed development sites.</p> |

Many of the policies embed the 20-minute neighbourhood principle. These policies seek to deliver development that manages and mitigates climate change risks, whilst the transport-related policies promote low carbon modes of transport in preference to private car usage. Furthermore, the Sustainable Communities site allocation and DPSC GEN policies seek to deliver all the needs of a community and are predicted to have largely beneficial effects. Nonetheless, the Housing and Site Allocation Policies propose significant new development

which will cumulatively lead to greenhouse gas emissions during the construction and will not fully mitigate emissions during the occupation of the developments.

#### D.14 SA Objective 11 - Energy and Waste

Table D-10 presents identified adverse impacts on energy and waste post-mitigation.

Table D-10: Identified adverse impacts and potential mitigation for SA Objective 11 - Energy and Waste post-mitigation.

| Identified adverse impact                                  | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|--|---|---|
| <p>Increased energy consumption related GHG emissions.</p> | <p>Policy DPS3 supports renewable and low carbon projects, including community-led schemes and outlines that new development should provide opportunities for incorporating decentralised, renewable, and low carbon energy schemes.</p> <p>Policy DPB1 seeks to ensure that all development contributes to the reduction of carbon emissions throughout the design, construction, and operation stages.</p> <p>Policy DPS2 aims to ensure that new homes are as energy efficient and sustainable as possible using BREEAM or HQM standards. The policy promotes a transition towards net zero carbon development.</p> <p>Policy DPE1 encourages high value employment development to achieve net zero carbon by 2050.</p> <p>Policies DPS1 also supports net zero carbon development and improvements in energy efficiency to achieve these goals through sustainable design and construction methods.</p> | <p>Although these policies would be expected to have a positive impact in helping to reduce emissions associated with the occupation of housing and mixed-use sites, they would not be expected to fully mitigate this impact and would be unlikely to facilitate sufficient reductions in carbon emissions to fully achieve net zero within the plan period.</p> |

| Identified adverse impact   | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|-----------------------------|---|--|
| Increase in household waste | <p>Although there are no policies within the plan which regard reducing household waste, various policies contribute to the aim. The provision of on-site site-specific waste and recycling provision is expected as part of good design for development in line with Policy DPB1: Character and Design. Policies DPI1, DPI2 and DPI3 would help to secure necessary infrastructure to help meet the needs of current residents which may include enhancement of waste and recycling infrastructure.</p> <p>Policy DPS2 seeks to ensure that all development follows the waste hierarchy to minimise the amount of waste disposed to landfill and maximise recycling rates.</p> | These policies seek to mitigate waste production to help to mitigate identified adverse impacts through implementing the waste hierarchy for all developments. |

Although these policies would be expected to have a beneficial effect on reducing emissions associated with the occupation of housing and mixed-use sites, they would not be expected to fully mitigate this impact and would be unlikely to facilitate sufficient reductions in carbon emissions to fully achieve net zero within the plan period. It is not clear if the policies will fully mitigate the adverse impacts of increased waste production from new development, which perhaps reflects the lack of a specific policy encompassing the management of household waste.

### D.15 SA Objective 12 - Water Resources

Table D-11 presents identified adverse impacts on water resources post-mitigation.

Table D-11: Identified adverse impacts and potential mitigation for SA Objective 12 - Water Resources post-mitigation.

| Identified adverse impact               | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?   |
|---|--|---|
| Increased risk of watercourse pollution | Policy DPN6 requires development to protect and enhance water resources and water quality and take measures to control pollution of the water environment. The policy encourages mitigation measures and nature-based solutions. Policy DPS2 sets out criteria | These policies would be expected to effectively manage and mitigate the potential adverse impacts on the contamination of watercourses within the Plan area arising through |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact? |
|---------------------------|--|---|
|                           | <p>to achieve sustainable design and construction including the requirement for development to minimise its impact on water resources and water quality.</p> <p>Policy DPN1 requires development sites adjacent to or with a main river or ordinary watercourses within its boundaries must include an undeveloped minimum 10m buffer zone and should take opportunities for river restoration where possible.</p> <p>Policy DPN3 seeks to deliver a range of green and blue infrastructure within proposals of new developments as well as protect existing green and blue infrastructure assets and links such as watercourses.</p> <p>Policy DPN10 sets requirements for effective measures which avoid impacts or contamination of watercourses.</p> <p>Policy DPSC1 (site 740 which has watercourses within its boundaries) requires a detailed site survey of watercourses on site.</p> <p>Site allocation policy DPA12 (site 13) outlines a commitment to protecting and enhancing the streams on the western boundaries and crossing the site.</p> | <p>development proposals.</p>                             |



| Identified adverse impact                 | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?  |
|---|---|--|
| Unsustainable levels of water consumption | <p>Policy DPS5 requires all development within the Sussex North Water Resource Zone to demonstrate water neutrality through water efficient design and offsetting of additional water use. It goes beyond the Building Regulations and sets the more ambitious standard of 85 lpd for new residential development, as opposed to 110 lpd. Additionally, the policy supports development or expansion of water supply infrastructure to serve current or future development or to improve long-term water supply.</p> <p>Policies DPI1, DPI2 and DPI3 seek to support infrastructure provisions and provides criteria for these developments. Policy DPI7 sets out how development proposals must demonstrate adequate water infrastructure provision.</p> <p>Policy DPS2 provides criteria to meet sustainable development standards and includes requirements for developments to meet relevant water consumption standards. This policy seeks to provide water neutrality through new developments and promote water efficiency measures through reducing water use and recycling water, for example through greywater recycling.</p> | These policies, along with adherence to national legislation and guidance from relevant studies on water provision in the area, would be expected to effectively manage and mitigate the potential adverse impacts on water resources for future use within the Plan area arising through development proposals. |

Given the consideration of water resources and water neutrality across the policies, it is considered that development will at least not result in an adverse cumulative effect in relation to SA Objective 12.

### D.16 SA Objective 13 - Economic Regeneration

Table D-12 presents identified adverse impacts on economic regeneration post-mitigation.

Table D-12: Identified adverse impacts and potential mitigation for SA Objective 13 Economic Regeneration post-mitigation.

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies               | Will the policies mitigate the identified adverse impact? |
|---------------------------|--|---|
| Limited access to local   | Site allocation policies DPA1-DPA17 and significant site allocation policies | Although these policies are likely to improve access to   |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies  | Will the policies mitigate the identified adverse impact?   |
|---------------------------|---|---|
| services and facilities   | <p>DPSC1-7 require financial contributions towards 'local community infrastructure'. Policies DPT1, DPT2 and DPT3 would be expected to improve access to local services through sensitive land use planning and improvements to sustainable transport provision.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns. Policy DPE7 seeks to protect smaller village and neighbourhood centres, to help meet the needs of local communities. Policy DPE8 sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</p> <p>Policy DPI6 supports proposals for the provision of community and cultural facilities and local services and resists the loss of existing community facilities.</p> <p>Site allocation policies DPSC1, DPSC2 and DPSC3 include on-site provision of local services. Policies DPSC4, DPSC5, DPSC6 and DPSC7 include financial contribution towards the provision of local services.</p> <p>Site allocation policy DPA8 (site 1121) outlines a commitment to deliver a mixed-use development including retail, leisure, residential and other complementary town centre uses to help provide a central and diverse hub for the town centre.</p> | local services and facilities and help promote regeneration of local centres through improved access, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations |

Overall, it is considered that these policies would not have a significant cumulative effect on development, particularly in rural locations.

#### D.17 SA Objective 14 - Economic Growth

Table D-13 presents identified adverse impacts on economic growth post-mitigation.

Table D-13: Identified adverse impacts and potential mitigation for SA Objective 13 Economic Regeneration post-mitigation.

| Identified adverse impact                  | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact?   |
|--|--|---|
| <p>Net change in employment floorspace</p> | <p>Policy DPE1 sets out criteria to achieve sustainable economic development including supporting expansion of businesses and ensuring that major development proposals allocated within the Plan demonstrate how they would address identified local skills shortages and support local employment.</p> <p>Policy DPE2 seeks to protect existing employment sites and provides the criteria in which it would support development of sites for employment uses. The policy would ensure that employment sites will only be re-developed for non-employment uses where the existing use is unviable.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p> <p>Policy DPE6 supports development within primary shopping areas which meet various criteria set out within the policy and aims to ensure that the vitality and viability of these centres are not harmed.</p> <p>Policy DPE8 supports small scale economic development within rural areas including farm diversification and leisure and tourism related development.</p> <p>Policy DPE9 seeks to enhance the tourism economy of Mid Sussex.</p> <p>Policy DPI2 sets out a planning obligation to provide access to employment opportunities created by development.</p> <p>Policy DPSC GEN requires all Significant Site developments to submit an Employment and Skills Plan to enable residents to take advantage of employment opportunities. Policy DPE3</p> | <p>It would be anticipated that these policies would mitigate any loss of employment floorspace because of residential development, with sufficient provision made elsewhere in the Plan area. However, the redevelopment of existing employment sites may lead to a change in the type and range of employment opportunities available within the Plan area.</p> |

| Identified adverse impact | Potential mitigating influence of emerging Local Plan policies   | Will the policies mitigate the identified adverse impact? |
|---------------------------|--|---|
|                           | allocates employment land within the sites allocated in Policies DPSC2 (site 18) and DPSC3 (site 799). |   |

Overall, the cumulative effect of the policies grouped into the Economy, Sustainable Communities and Infrastructure themes would have a positive impact on development in Mid Sussex through the delivery of economic improvements in the form of employment opportunities, increased tourism and leisure related development, and investment in businesses.

#### **D.18 Post-mitigation site assessment**

Following the identification of mitigating effects of the emerging updated District Plan policies on the pre-mitigation site assessment findings, the findings of this assessment for the new eight reasonable alternative sites is shown in Table 7-1 in Section 7.

# **E Regulation 18 SA Pre-Mitigation Site Assessment undertaken by Lepus Consulting (2022)**

## **E.1 Overview**

As outlined in Section 6, MSDC received several comments from members of the public and consultees on the results of the site assessment undertaken by Lepus Consulting presented within the Regulation 18 SA.

These comments and questions have been reviewed by JBA Consulting, and amendments have been made to site assessment scoring assigned where it is deemed within the remit of the SA and in accordance with the topic specific methodologies and assumptions outlined in section 3.4 above. Where comments relate to scores based off travel time data provided by MSDC, provision of mitigation (such as Biodiversity Net Gain), or methodologies and assumptions outlined by Lepus Consulting, scores remain as per the Regulation 18 SA.

The full site assessment undertaken by Lepus Consulting during the Regulation 18 SA is presented in this Appendix, with tracked changes used to denote amendments made to scoring as appropriate.



# Appendix C: Pre-Mitigation Site Assessments

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## C.1 Overview

- C.1.1.1 This report comprises Appendix C of the Regulation 18 SA Environmental Report (ER) and should be read alongside this report.
- C.1.1.2 The following sections of this appendix provide an appraisal of each of the 42 reasonable alternative sites for residential development and two reasonable alternative sites for C2 use (see Figure C.1.1) identified by Mid Sussex District Council, in accordance with the SA methodology set out in Chapter 2 of the main SA report.
- C.1.1.3 Each appraisal includes an SA scoring matrix that provides an indication of the nature and magnitude of effects, at the pre-mitigation stage (see Tables C.2.1 – C.15.1). Assessment narratives are presented alongside the scoring matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- C.1.1.4 Each site is assessed against the SA Framework (Appendix A), which is comprised of the following objectives:
- SA Objective 1 - To ensure that everyone has the opportunity to live in a home for their need and which they can afford (housing)
  - SA Objective 2 - To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health (health and wellbeing)
  - SA Objective 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 (education)
  - SA Objective 4 - To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities (community and crime)
  - SA Objective 5 - To reduce the risk to people, properties, the economy and the environment of flooding from all sources (flooding and surface water)
  - SA Objective 6 - 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 (natural resources)
  - SA Objective 7 - To conserve and enhance the district's biodiversity and geodiversity (biodiversity and geodiversity)
  - SA Objective 8 - To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place (landscape)
  - SA Objective 9 - To protect, enhance and make accessible for enjoyment, the district's historic environment (cultural heritage)
  - SA Objective 10 - To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby

reducing the level of greenhouse gases from private cars and their impact on climate change (climate change and transport)

- SA Objective 11 - To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal (energy and waste)
- SA Objective 12 - To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management (water resources)
- SA Objective 13 - To encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres (economic regeneration)
- SA Objective 14 - To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities (economic growth)

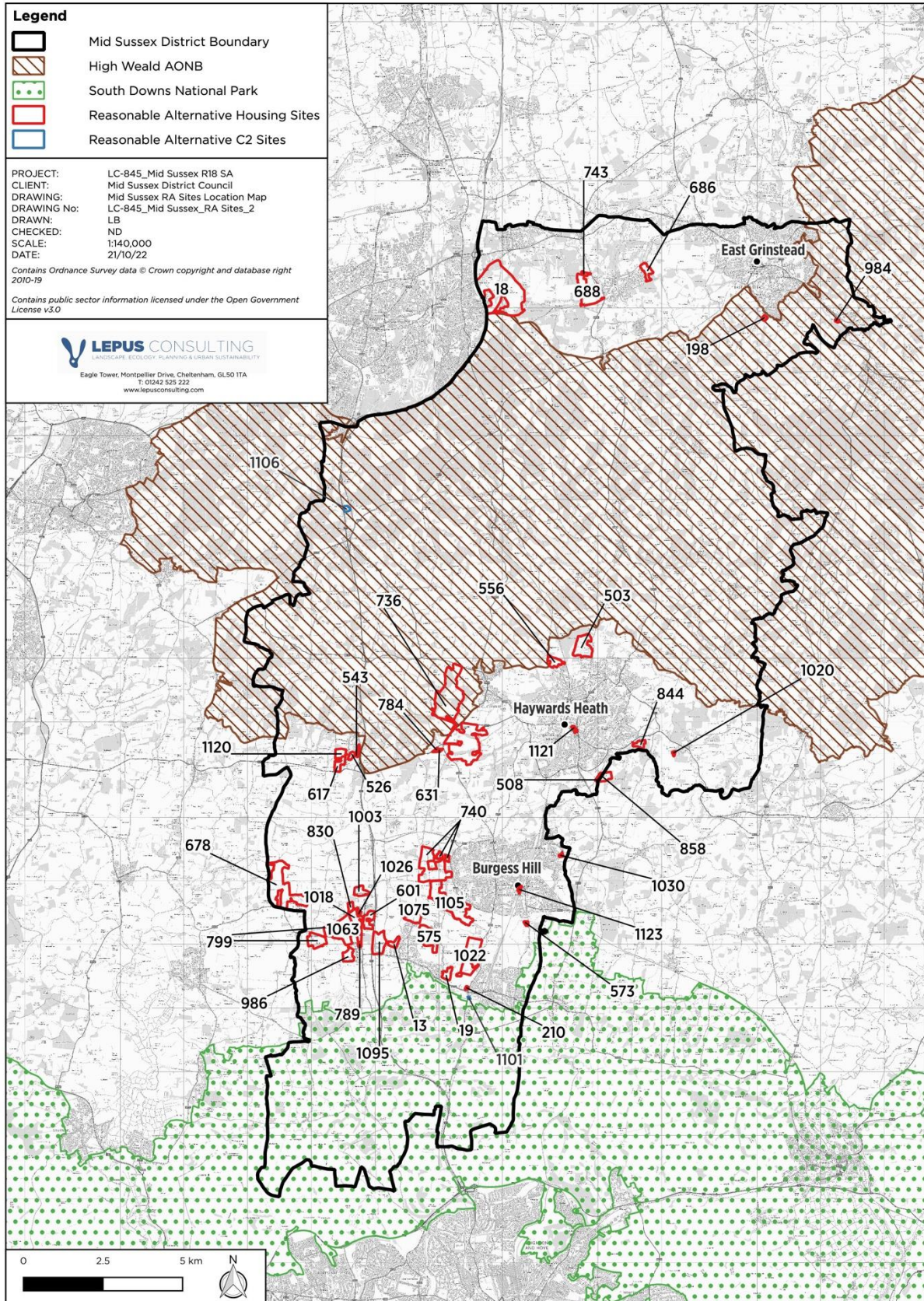


Figure C.1.1: Location map of the reasonable alternative sites within Mid Sussex

## C.2 SA Objective 1 - Housing

### C.2.1 Net Gain in Housing

- C.2.1.1 Residential-led development would be expected to result in an overall net gain in housing. Since the reasonable alternative sites in Mid Sussex are proposed for residential and/or mixed use development, it would be expected that all sites would have a positive impact on housing provision within the Plan area. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs upon development and are therefore considered to have major positive impacts on housing provision. Sites which have been identified as having capacity of 99 dwellings or less are expected to have a minor positive impact on housing provision.
- C.2.1.2 The site assessments concluded that 23 sites have been identified as having capacity for 100 dwellings or more and have therefore been categorised as having the potential to have a major positive impact on housing provision. Some sites within this category were identified as having capacity for a significantly higher number of residential dwellings such as Site 503 (700 dwellings) and Site 678 (900 dwellings).
- C.2.1.3 On the other hand, some sites were identified as having capacity for significantly less dwellings such as Site 984 (8 dwellings) and Site 1030 (25 dwellings). Development of these sites could have a minor positive impact on housing provision within the Plan area.
- C.2.1.4 Sites 18, 736, 740, 799 and 1105 are proposed for residential or mixed-use developments and were identified as having capacity for 1,000 dwellings or more.
- C.2.1.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The proposed development at these two sites would be expected to have a minor positive impact on housing provision.

Table C.2.1: Sites impact matrix for SA Objective 1 - Housing

| Site Ref | Net Gain in Housing |
|----------|---------------------|
| 13       | +                   |
| 18       | ++                  |
| 19       | +                   |
| 198      | +                   |
| 503      | ++                  |
| 508      | +                   |
| 210      | +                   |
| 526      | +                   |
| 543      | +                   |
| 556      | +                   |
| 573      | +                   |
| 575      | ++                  |
| 601      | ++                  |
| 617      | ++                  |
| 631      | +                   |
| 678      | ++                  |
| 686      | ++                  |
| 688      | ++                  |
| 736      | ++                  |
| 740      | ++                  |
| 743      | +                   |
| 784      | +                   |
| 789      | +                   |
| 799      | ++                  |
| 830      | ++                  |
| 844      | ++                  |
| 858      | +                   |
| 984      | +                   |
| 986      | ++                  |
| 1003     | ++                  |
| 1018     | ++                  |
| 1020     | +                   |
| 1022     | ++                  |
| 1026     | +                   |
| 1030     | +                   |
| 1063     | +                   |
| 1075     | ++                  |
| 1095     | ++                  |
| 1101     | +                   |
| 1105     | ++                  |
| 1106     | +                   |
| 1120     | ++                  |
| 1121     | ++                  |
| 1123     | ++                  |

## C.3 SA Objective 2 – Health and Wellbeing

### C.3.1 NHS hospital with A&E Department

C.3.1.1 The target distance for sustainable access to an NHS hospital with A&E department is 5km. 31 sites are located outside of this target distance, and therefore proposed developments at these sites are expected to have a minor negative impact on access to essential healthcare.

C.3.1.2 Sites 198, 503, 508, 556, 686, 736, 844, 858, 984, 1020, 1030, 1121 and 1123 are within 5km of either Queen Victoria Hospital in East Grinstead or Princess Royal Hospital in Haywards Heath; therefore, the proposed development at these 13 sites is considered to have the potential for a minor positive impact on access to essential healthcare.

### C.3.2 Pedestrian Access to GP Surgery

C.3.2.1 The target distance for a proposed development is to be within approximately 1.2km or a 15-minute walk from a GP surgery or a health centre.

C.3.2.2 Sites 1106, 1121 and 1123 are located within a 10-minute walk from healthcare facilities and proposed development at these three sites would therefore be expected to have a major positive impact on sustainable access to healthcare.

C.3.2.3 Sites ~~137~~, 210, 556 and 743 are located within a 15-minute walking distance and therefore proposed development at these four sites would be expected to have a minor positive impact on access to healthcare.

C.3.2.4 All other sites are located further than the sustainable 15-minute walk threshold from healthcare facilities. However, Sites 198, 573, 575, 686, 688, 740, 844, 1075, 1095 and 1101 are located within a 20-minute walk from healthcare facilities, and the potential impact on access to healthcare of a proposed development at these ten sites is expected to be negligible.

C.3.2.5 The remaining 27 sites are located over the sustainable target distance of a 20-minute walk from these facilities. It would be expected that the proposed development at these remaining sites would have a minor negative impact on access to healthcare.

### C.3.3 Leisure Centres

C.3.3.1 Proposed development located within the sustainable target distance of 1.5km to a leisure centre is expected to have positive impacts on access to these facilities.

C.3.3.2 Site 740 is located within 1.5km from The Triangle Leisure Centre in Burgess Hill, and Sites 556 and 1121 are located within 1.5km from The Dolphin Leisure Centre in Haywards Heath. It is therefore expected that the proposed development at these three sites would have a minor positive impact on access to leisure facilities and the resulting health and wellbeing of residents.

C.3.3.3 The remaining 41 reasonable alternative sites are further than the target distance from the nearest leisure centre and would therefore be expected to have a minor negative impact on access to these facilities.

### C.3.4 AQMA

C.3.4.1 The majority of reasonable alternative sites (42 out of 44) are located at least 200m from an Air Quality Management Area (AQMA) and therefore a minor positive impact on human health would be expected for site end users at these 42 sites.

C.3.4.2 Sites 210 and 1101 are located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at these two sites could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.

### C.3.5 Main Road

C.3.5.1 Sites located within 200m from a main road would be expected to have a minor negative impact on the health and wellbeing of site-end users. The proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution.

C.3.5.2 Sites 18, 210, 526, 543, 601, 617, 631, 736, 740, 784, 844, 984, 1022, 1095, 1101, 1105, 1106 and 1120 are located less than 200m from one or more main roads including the A22, A23 and A272. The proposed development at these 18 sites is therefore considered to have a minor negative impact on site end users.

C.3.5.3 The remaining 26 sites are located over 200m from a main road and are therefore expected to have a minor positive impact on site end user health and wellbeing through being less likely to expose site end users to potentially poor air quality and noise pollution associated with traffic using main roads.

### C.3.6 Access to Greenspace

C.3.6.1 Access to outdoor space and a diverse range of natural habitats is known to have mental and physical health benefits. A minor positive impact on residents' health and wellbeing

can therefore be expected if a site is within the target distance of 300m from an OS Green space<sup>1</sup>, a leisure facility or an open space facility.

C.3.6.2 Sites 198, 508, 526, 543, 573, 631, 784, 789, 830, 858, 984, 986, 1003, 1020, 1026, 1030, 1075, 1105, 1121 and 1123 are within the target distance of these facilities and are therefore expected to potentially have a minor positive impact on the health and wellbeing of site end users at these locations.

C.3.6.3 The remaining 24 sites are located outside of the target distance of 300m from greenspaces which could potentially lead to a minor negative impact on access to these facilities and subsequently the health and wellbeing of site end users at these locations.

### C.3.7 Net Loss of Greenspace

~~C.3.7.1 Site 1105 coincides with two areas of publicly accessible greenspace identified on the Council's dataset, including a large proportion of 'Maltings Farm', and a small proportion of 'Hammond Ridge Meadows'. The proposed development at this site could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area. It is not anticipated that any of the reasonable alternative sites would result in a net loss of publicly accessible greenspace.~~

### C.3.8 PRow/Cycle Paths

C.3.8.1 Proposed development sites that provide good accessibility to the PRow and/or cycle path network would likely encourage residents' engagement in physical activity and active travel which could have a resulting minor positive impact on the health and wellbeing of site end users.

C.3.8.2 All reasonable alternative sites, with the exception of Site 1106, are expected to provide access to Mid Sussex's PRow and/or cycle path network and therefore are likely to have a minor positive impact on access to these facilities with subsequent health benefits.

C.3.8.3 Site 1106 is located outside of the sustainable target distance to the PRow and cycle network. The proposed development at this site could potentially restrict the access of site end users to these active travel networks (i.e. for potential employees of the proposed C2 development), resulting in a minor negative impact for this receptor.

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<sup>1</sup> Ordnance Survey (2022) OS Greenspace – A More Active, Greener, Healthier Nation. Available at: <https://getoutside.ordnancesurvey.co.uk/greenspaces/> [Accessed 27/09/2022]



Table C.3.1: Sites impact matrix for SA Objective 2 - Health and Wellbeing

| Site Reference | NHS hospital with A&E Department | Pedestrian Access to GP Surgery | Leisure Centres | AQMA | Main Road | Access to Greenspace | Net Loss of Greenspace | PRoW/Cycle Paths |
|----------------|----------------------------------|---------------------------------|-----------------|------|-----------|----------------------|------------------------|------------------|
| 13             | -                                | 0+                              | -               | +    | +         | -                    | 0                      | +                |
| 18             | -                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 19             | -                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 198            | +                                | 0                               | -               | +    | +         | +                    | 0                      | +                |
| 210            | -                                | +                               | -               | -    | -         | -                    | 0                      | +                |
| 503            | +                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 508            | +                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 526            | -                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 543            | -                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 556            | +                                | +                               | +               | +    | +         | -                    | 0                      | +                |
| 573            | -                                | 0                               | -               | +    | +         | +                    | 0                      | +                |
| 575            | -                                | 0                               | -               | +    | +         | -                    | 0                      | +                |
| 601            | -                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 617            | -                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 631            | -                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 678            | -                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 686            | +                                | 0                               | -               | +    | +         | -                    | 0                      | +                |
| 688            | -                                | 0                               | -               | +    | +         | -                    | 0                      | +                |
| 736            | +                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 740            | -                                | 0                               | +               | +    | -         | -                    | 0                      | +                |
| 743            | -                                | +                               | -               | +    | +         | -                    | 0                      | +                |
| 784            | -                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 789            | -                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 799            | -                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 830            | -                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 844            | +                                | 0                               | -               | +    | -         | -                    | 0                      | +                |
| 858            | +                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 984            | +                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 986            | -                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 1003           | -                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 1018           | -                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 1020           | +                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 1022           | -                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 1026           | -                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 1030           | +                                | -                               | -               | +    | +         | +                    | 0                      | +                |
| 1063           | -                                | -                               | -               | +    | +         | -                    | 0                      | +                |
| 1075           | -                                | 0                               | -               | +    | +         | +                    | 0                      | +                |
| 1095           | -                                | 0                               | -               | +    | -         | -                    | 0                      | +                |
| 1101           | -                                | 0                               | -               | -    | -         | -                    | 0                      | +                |
| 1105           | -                                | -                               | -               | +    | -         | +                    | 0                      | +                |
| 1106           | -                                | ++                              | -               | +    | -         | -                    | 0                      | -                |
| 1120           | -                                | -                               | -               | +    | -         | -                    | 0                      | +                |
| 1121           | +                                | ++                              | +               | +    | +         | +                    | 0                      | +                |
| 1123           | +                                | ++                              | -               | +    | +         | +                    | 0                      | +                |

## C.4 SA Objective 3 – Education

### C.4.1 Pedestrian Access to Primary Schools

- C.4.1.1 The sustainable target distance for a residential site to be located to a primary school is within a 15-minute walk (approximately 1.2km) or less to the school which would provide site end users with good access to primary education. Sites 13, 198, 526, 617, 789, 986, 1020, 1063, 1120 and 1121 are located within a 10-minute walk from a primary school which is expected to have a major positive impact on the access to primary schools for site end users.
- C.4.1.2 Sites 210, 543, 556, 573, 743, 799, 984 and 1123 are located within 15 minutes' walk from a primary school which is expected to have a minor positive impact on access to primary education.
- C.4.1.3 Sites 686, 688, 740, 844, 1018, 1026, 1030, 1075 and 1095 are located within a 20-minute walk from a primary school. It is expected that the proposed development at these nine sites would have a negligible impact on access to primary education facilities.
- C.4.1.4 The remaining residential sites are located over a 20-minute walk from primary schools and therefore the proposed development at these 15 sites would be likely to have a minor negative impact on access to primary education for site end users.

### C.4.2 Pedestrian Access to Secondary Schools

- C.4.2.1 To have sustainable access to secondary education, a proposed residential site should be located within 1.5km of these facilities. The following sites are located within this target distance to a secondary school: 210 (Downlands Community School); 1123 and 573 (Oakmeeds Community College); 740 (St Paul's Catholic College); and 1121 (Oathill Community College). These five sites are therefore likely to have a minor positive impact on access to secondary education for site end users.
- C.4.2.2 The remaining 37 residential sites are located outside of the target distance from the nearest secondary school, and it is therefore expected that the proposed development at these sites will likely have a minor negative impact on access to secondary education for site end users.
- C.4.2.3 Residential sites which have been assessed as being within target distance for both primary and secondary schools would likely have an overall major positive impact on access to education (Sites 210, 573, 1121 and 1123) (see Table 4.2 within the main SA Report).

C.4.2.4 Sites 1101 and 1106 are proposed for C2 development, and as such, have not been assessed for their access to education. A negligible impact would be expected for these two sites.

### C.4.3 Further Education

C.4.3.1 Residential sites which are located within 3km from a further education facility are likely to have good access to these facilities and therefore a minor positive impact on access to education for site end users could be expected. Eight reasonable alternative sites meet this criteria; Sites 503, 556, 736 and 1121 are located within the target distance to Central Sussex College, and Sites 736, 740, 1075, 1105 and 1123 are located within the target distance to St Paul's Catholic College.

Table C.4.1: Sites impact matrix for SA Objective 3 - Education

| Site Ref | Pedestrian Access to Primary School | Pedestrian Access to Secondary School | Further Education |
|----------|-------------------------------------|---------------------------------------|-------------------|
| 13       | ++                                  | -                                     | 0                 |
| 18       | -                                   | -                                     | 0                 |
| 19       | -                                   | -                                     | 0                 |
| 198      | ++                                  | -                                     | 0                 |
| 210      | +                                   | +                                     | 0                 |
| 503      | -                                   | -                                     | +                 |
| 508      | -                                   | -                                     | 0                 |
| 526      | ++                                  | -                                     | 0                 |
| 543      | +                                   | -                                     | 0                 |
| 556      | +                                   | -                                     | +                 |
| 573      | +                                   | +                                     | 0                 |
| 575      | -                                   | -                                     | 0                 |
| 601      | -                                   | -                                     | 0                 |
| 617      | ++                                  | -                                     | 0                 |
| 631      | -                                   | -                                     | 0                 |
| 678      | -                                   | -                                     | 0                 |
| 686      | 0                                   | -                                     | 0                 |
| 688      | 0                                   | -                                     | 0                 |
| 736      | -                                   | -                                     | +                 |
| 740      | 0                                   | +                                     | +                 |
| 743      | +                                   | -                                     | 0                 |
| 784      | -                                   | -                                     | 0                 |
| 789      | ++                                  | -                                     | 0                 |
| 799      | +                                   | -                                     | 0                 |
| 830      | -                                   | -                                     | 0                 |
| 844      | 0                                   | -                                     | 0                 |
| 858      | -                                   | -                                     | 0                 |
| 984      | +                                   | -                                     | 0                 |
| 986      | ++                                  | -                                     | 0                 |
| 1003     | -                                   | -                                     | 0                 |
| 1018     | 0                                   | -                                     | 0                 |
| 1020     | ++                                  | -                                     | 0                 |
| 1022     | -                                   | -                                     | 0                 |
| 1026     | 0                                   | -                                     | 0                 |
| 1030     | 0                                   | -                                     | 0                 |

[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)  
[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)  
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| Site Ref | Pedestrian Access to Primary School | Pedestrian Access to Secondary School | Further Education |
|----------|-------------------------------------|---------------------------------------|-------------------|
| 1063     | ++                                  | -                                     | 0                 |
| 1075     | 0                                   | -                                     | +                 |
| 1095     | 0                                   | -                                     | 0                 |
| 1101     | 0                                   | 0                                     | 0                 |
| 1105     | -                                   | +                                     | +                 |
| 1106     | 0                                   | 0                                     | 0                 |
| 1120     | ++                                  | -                                     | 0                 |
| 1121     | ++                                  | +                                     | +                 |
| 1123     | +                                   |                                       | +                 |

## C.5 SA Objective 4 – Community and Crime

### C.5.1 IMD

C.5.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>2</sup>. Deprivation levels within Mid Sussex varies from area to area, however, the district on a whole is relatively affluent, and none of the RA sites fall within of the 10% most deprived areas within England as identified by the study.

### C.5.2 Pedestrian Access to Community Facilities

C.5.2.1 The target distance a proposed site should be within to have sustainable access to community facilities such as shops, community halls, places of worship and libraries is within a 15-minute walk.

C.5.2.2 Sites 1121 and 1123 are located within a 10-minute walk from community facilities and therefore the proposed development at these two sites would be expected to have a major positive impact on access to community facilities.

C.5.2.3 Sites 13, 210 and 1101 are located within a 15-minute walk from community facilities and therefore proposed development at these three sites would be expected to have a minor positive impact for site end users.

~~C.5.2.4 Sites 198, 573 and 1095 are located within a 20-minute walk from community facilities. The proposed development at these three sites would be likely to have a negligible impact on access to community facilities.~~

~~C.5.2.5~~C.5.2.4 The remaining sites are located over the threshold of a 2015-minute walk from community facilities and therefore the proposed development on these 36-39 sites would be likely to have a minor negative impact on access to community facilities for site end users.

### C.5.3 Public Transport Access to Community Facilities

C.5.3.1 Sites that are located within a 30-minute journey or less using public transport to access community facilities such as a shop, a community hall, a place of worship or a library would

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<sup>2</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 26/01/22]

be expected to have minor positive impacts for site end users relating to the accessibility to these facilities.

C.5.3.2 Sites 13, 210, 1075, 1101, 1121 and 1123 are located within less than 10-minutes via public transport from community facilities and are therefore expected to have a major positive impact on accessibility to community facilities.

C.5.3.3 Sites 556, 508, 858, 984 and 1030 are located within a 30-minute public transport journey from community services and it is therefore expected that the proposed development at these sites would result in a minor positive impact on accessibility to these facilities.

C.5.3.4 The remaining 33 sites are further than a 30-minute public transport journey away from community facilities and it is therefore expected that the proposed development at those sites would have a minor negative impact for the accessibility to those facilities.

#### C.5.4 Loss of Community Facilities

C.5.4.1 Site 1121 coincides with The Orchards Shopping Centre in Haywards Heath, which includes a range of local shops and services including Tesco Express and Marks and Spencer Food. The proposed residential development at this site could potentially result in the loss of these shops, and subsequently reduce the range of community facilities available in Haywards Heath. A minor negative impact on the provision of community facilities could occur.

#### C.5.5 Built Up Area Boundary

C.5.5.1 Proposed sites which are located over 150m from a built-up area boundary, attributed to 23 of the 44 reasonable alternative sites, are identified as having the potential to have a minor negative impact on cohesion and integration with existing local communities due to being physically separated from these communities.

Table C.5.1: Sites impact matrix for SA Objective 4 - Equality and Crime

| Site Ref | IMD | Pedestrian Access to Community Facilities | Public Transport Access to Community Facilities | Loss of Community Facilities | Built Up Area Boundary |
|----------|-----|---|---|------------------------------|------------------------|
| 13       | 0   | +   | ++  | 0                            | 0                      |
| 18       | 0   | -   | -   | 0                            | -                      |
| 19       | 0   | -   | -   | 0                            | 0                      |
| 198      | 0   | -0  | -   | 0                            | 0                      |
| 210      | 0   | +   | ++  | 0                            | 0                      |
| 503      | 0   | -   | -   | 0                            | -                      |
| 508      | 0   | -   | +   | 0                            | 0                      |
| 526      | 0   | -   | -   | 0                            | 0                      |
| 543      | 0   | -   | -   | 0                            | 0                      |
| 556      | 0   | -   | +   | 0                            | 0                      |
| 573      | 0   | -0  | -   | 0                            | 0                      |
| 575      | 0   | -   | -   | 0                            | -                      |
| 601      | 0   | -   | -   | 0                            | -                      |
| 617      | 0   | -   | -   | 0                            | -                      |
| 631      | 0   | -   | -   | 0                            | 0                      |
| 678      | 0   | -   | -   | 0                            | -                      |
| 686      | 0   | -   | -   | 0                            | 0                      |
| 688      | 0   | -   | -   | 0                            | -                      |
| 736      | 0   | -   | -   | 0                            | -                      |
| 740      | 0   | -   | -   | 0                            | -                      |
| 743      | 0   | -   | -   | 0                            | -                      |
| 784      | 0   | -   | -   | 0                            | 0                      |
| 789      | 0   | -   | -   | 0                            | -                      |
| 799      | 0   | -   | -   | 0                            | -                      |
| 830      | 0   | -   | -   | 0                            | -                      |
| 844      | 0   | -   | -   | 0                            | 0                      |
| 858      | 0   | -   | +   | 0                            | -                      |
| 984      | 0   | -   | +   | 0                            | 0                      |
| 986      | 0   | -   | -   | 0                            | -                      |
| 1003     | 0   | -   | -   | 0                            | -                      |
| 1018     | 0   | -   | -   | 0                            | -                      |
| 1020     | 0   | -   | -   | 0                            | 0                      |
| 1022     | 0   | -   | -   | 0                            | -                      |
| 1026     | 0   | -   | -   | 0                            | 0                      |
| 1030     | 0   | -   | +   | 0                            | 0                      |
| 1063     | 0   | -   | -   | 0                            | -                      |
| 1075     | 0   | -   | ++  | 0                            | 0                      |
| 1095     | 0   | -0  | -   | 0                            | -                      |
| 1101     | 0   | +   | ++  | 0                            | 0                      |
| 1105     | 0   | -   | -   | 0                            | -                      |
| 1106     | 0   | -   | -   | 0                            | -                      |
| 1120     | 0   | -   | -   | 0                            | -                      |
| 1121     | 0   | ++  | ++  | -                            | 0                      |
| 1123     | 0   | ++  | ++  | 0                            | 0                      |

## C.6 SA Objective 5 – Flooding

### C.6.1 Fluvial Flood Risk

- C.6.1.1 Sites 556, 678, 740 and 1105 are partially located within Flood Zone 3, associated with watercourses such as the River Adur and minor watercourse 'Pooke Bourne', meaning that there is a flood risk of 1% or more annually in the affected areas. The proposed development at these four sites could locate site-end users in areas of high flood risk and therefore a major negative impact on flooding at these sites could be expected.
- C.6.1.2 Sites 18 and 736 are located within Flood Zone 2, meaning that there is a flood risk of between 0.1% and <1% annually within the affected area. The proposed development at these two sites is therefore likely to have a minor negative impact on flooding.
- C.6.1.3 The remaining 38 reasonable alternative sites are located within Flood Zone 1 where there is less than 0.1% chance of flooding in any year. The proposed development at these sites is likely to locate site-end users in areas at low risk of flooding and therefore a minor positive impact could be expected.

### C.6.2 Surface Water Flood Risk

- C.6.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high 1/30) risk relating to the probability of surface water flooding occurring in a given area.
- C.6.2.2 The proposed development at 22 of the 44 reasonable alternative sites (Sites 18, 19, 556, 575, 601, 678, 686, 688, 736, 740, 743, 799, 830, 986, 1003, 1018, 1022, 1026, 1075, 1095, 1101 and 1105) coincide with areas of high SWFR and therefore development of these sites could locate site end users within areas at high risk of surface flooding, potentially leading to major negative impacts.
- C.6.2.3 The proposed development at Sites 13, 503, 508, 617, 844, 1020, 1106, 1120, 1121 and 1123 coincide with areas of low and medium SWFR and could therefore have a minor negative impact on flooding by potentially locating site end users within these affected areas.
- C.6.2.4 The remaining 12 reasonable alternative sites do not coincide with areas of SWFR and therefore the proposed development would be expected to have a minor positive impact on flooding by locating site end users in areas not prone to surface water flooding.



Table C.6.1: Sites impact matrix for SA Objective 5 – Flooding

| Site Ref | Fluvial Flood Risk | Surface Water Flood Risk |
|----------|--------------------|--------------------------|
| 13       | +                  | -                        |
| 18       | -                  | --                       |
| 19       | +                  | --                       |
| 198      | +                  | +                        |
| 210      | +                  | +                        |
| 503      | +                  | -                        |
| 508      | +                  | -                        |
| 526      | +                  | +                        |
| 543      | +                  | +                        |
| 556      | --                 | --                       |
| 573      | +                  | +                        |
| 575      | +                  | --                       |
| 601      | +                  | --                       |
| 617      | +                  | -                        |
| 631      | +                  | +                        |
| 678      | --                 | --                       |
| 686      | +                  | --                       |
| 688      | +                  | --                       |
| 736      | -                  | --                       |
| 740      | --                 | --                       |
| 743      | +                  | --                       |
| 784      | +                  | +                        |
| 789      | +                  | +                        |
| 799      | +                  | --                       |
| 830      | +                  | --                       |
| 844      | +                  | -                        |
| 858      | +                  | +                        |
| 984      | +                  | +                        |
| 986      | +                  | --                       |
| 1003     | +                  | --                       |
| 1018     | +                  | --                       |
| 1020     | +                  | -                        |
| 1022     | +                  | --                       |
| 1026     | +                  | --                       |
| 1030     | +                  | +                        |
| 1063     | +                  | +                        |
| 1075     | +                  | --                       |
| 1095     | +                  | --                       |
| 1101     | +                  | --                       |
| 1105     | --                 | --                       |
| 1106     | +                  | -                        |
| 1120     | +                  | -                        |
| 1121     | +                  | -                        |
| 1123     | +                  | -                        |

## C.7 SA Objective 6 – Natural Resources

### C.7.1 Previously Developed Land

- C.7.1.1 42 of the 44 proposed development sites wholly or partially compromise undeveloped land which could lead to minor negative impacts on natural resources associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- C.7.1.2 Sites 1121 and 1123 largely comprise previously developed land, and so development at these locations would be likely to have minor positive impacts on natural resources through the potential for efficient use of land.

### C.7.2 Agricultural Land Classification

- C.7.2.1 Sites 18, 503, 575, 678, 736, 740, 799, 1022, 1095 and 1105 are classified as ALC Grade 1, 2 or 3 and are over 20ha in area. Therefore, due to the large nature of these sites and the potential for irreversible loss of these valuable soil resources, it is expected that the proposed development at these 10 sites would have major negative impacts on natural resources.
- C.7.2.2 Sites 13, 19, 210, 508, 526, 543, 556, 573, 601, 617, 631, 686, 688, 784, 789, 830, 844, 858, 984, 986, 1003, 1018, 1020, 1026, 1030, 1063, 1075, 1101 and 1106 and 1120 are less than 20ha in area and are located either wholly or partially upon land classified as ALC Grade 1, 2 or 3. The proposed development at these 30 sites would be likely to have a minor negative impact on agricultural land through the potential irreversible loss of BMV soil resources.
- C.7.2.3 Sites 198 and 743 are located upon land which is classified as ALC Grades 4 and 5 and therefore the proposed development at these sites is likely to result in negligible impacts on natural resources.

### C.7.3 Mineral Safeguarding Area

- C.7.3.1 Nationally and locally important mineral resources which should be protected from unnecessary sterilisation are identified within Mineral Safeguarding Areas (MSAs).
- C.7.3.2 34 of the 44 proposed development sites coincide with MSAs that contain brick clay, consolidated bedrock or unconsolidated sand. The development of these sites could potentially lead to sterilisation of these mineral resources where the minerals would be inaccessible for potential extraction in the future. Therefore, the proposed development at these sites would be likely to have a minor negative impact on natural resources.

C.7.3.3 Sites 18, 508, 631, 688, 743, 784, 858, 984, 1106 and 1121 do not coincide with MSAs and therefore proposed development at these sites is therefore expected to have a negligible impact on mineral resources.

Table C.7.1: Sites impact matrix for SA Objective 6 - Natural Resources

| Site Ref | Previously Developed Land | Agricultural Land Classification | Mineral Safeguarding Area |
|----------|---------------------------|----------------------------------|---------------------------|
| 13       | -                         | -                                | -                         |
| 18       | -                         | --                               | 0                         |
| 19       | -                         | -                                | -                         |
| 198      | -                         | 0                                | -                         |
| 210      | -                         | -                                | -                         |
| 503      | -                         | --                               | -                         |
| 508      | -                         | -                                | 0                         |
| 526      | -                         | -                                | -                         |
| 543      | -                         | -                                | -                         |
| 556      | -                         | -                                | -                         |
| 573      | -                         | -                                | -                         |
| 575      | -                         | --                               | -                         |
| 601      | -                         | -                                | -                         |
| 617      | -                         | -                                | -                         |
| 631      | -                         | -                                | 0                         |
| 678      | -                         | --                               | -                         |
| 686      | -                         | -                                | -                         |
| 688      | -                         | -                                | 0                         |
| 736      | -                         | --                               | -                         |
| 740      | -                         | --                               | -                         |
| 743      | -                         | 0                                | 0                         |
| 784      | -                         | -                                | 0                         |
| 789      | -                         | -                                | -                         |
| 799      | -                         | --                               | -                         |
| 830      | -                         | -                                | -                         |
| 844      | -                         | -                                | -                         |
| 858      | -                         | -                                | 0                         |
| 984      | -                         | -                                | 0                         |
| 986      | -                         | -                                | -                         |
| 1003     | -                         | -                                | -                         |
| 1018     | -                         | -                                | -                         |
| 1020     | -                         | -                                | -                         |
| 1022     | -                         | --                               | -                         |
| 1026     | -                         | -                                | -                         |
| 1030     | -                         | -                                | -                         |
| 1063     | -                         | -                                | -                         |
| 1075     | -                         | -                                | -                         |
| 1095     | -                         | --                               | -                         |
| 1101     | -                         | -                                | -                         |
| 1105     | -                         | --                               | -                         |
| 1106     | -                         | -                                | 0                         |
| 1120     | -                         | -                                | -                         |
| 1121     | +                         | 0                                | 0                         |
| 1123     | +                         | 0                                | -                         |

## C.8 SA Objective 7 – Biodiversity

### C.8.1 Habitats Sites

C.8.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. Sites 198, 556, 686, 688, 984, 1030, 1121 and 1123 are located within the established 7km Zone of Influence<sup>3</sup> for Ashdown Forest SPA and SAC which is located to the north east of the district boundary. The proposed development could increase recreational pressure on this Habitats site and therefore potentially have minor negative impacts on biodiversity upon development of these sites.

C.8.1.2 36 of the 44 reasonable alternative sites are not located within 7km of Ashdown Forest SPA and SAC and are therefore expected to have negligible impacts on biodiversity associated with this Habitats site. Potential effects of development on other Habitats sites will be explored fully in the Habitats Regulations Assessment.

### C.8.2 Sites of Special Scientific Interest

C.8.2.1 Site 686 is located within an SSSI IRZ which states that “*Any residential development of 100 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. The proposed development of 125 dwellings at this site could therefore have potentially minor negative impact on SSSIs related to this IRZ (including ‘Hedgecourt’ SSSI and ‘Weir Wood Reservoir’ SSSI).

C.8.2.2 Site 1106 is located within an SSSI IRZ which states that “*Any residential development of 50 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. This site is proposed for C2 use, with an unknown number of beds. The potential effects of the development at this site on nearby SSSIs is uncertain.

### C.8.3 Ancient Woodlands

C.8.3.1 Mid Sussex District contains large areas of ancient woodland, especially concentrated within the northern area of the district including ‘Worth Forest’ and ‘Wakehurst Park’. Sites 18, 575, 601, 678, 688, 736, 740 and 1022 coincide with areas of ancient woodland and development at these locations could result in a direct loss of these important biodiversity assets.

C.8.3.2 Sites 198, 503, 686, 743, 844, 858 and 1020 are located adjacent to or within 15m of ancient woodlands. The proposed development at these seven sites would therefore be

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<sup>3</sup> Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Accessed on 27/09/22]

likely to have a minor negative impact on ancient woodland by increasing development related pressures or threats.

## C.8.4 Veteran Trees

C.8.4.1 Being a heavily wooded district, Mid Sussex has large quantities of veteran trees scattered throughout the area. Sites 18, 503, 688 and 740 have been identified as coinciding with one or more veteran trees. The proposed development at these sites could potentially lead to major negative impacts including the damage or loss of these important biodiversity assets.

## C.8.5 Local Nature Reserves

C.8.5.1 There are eight Local Nature Reserves (LNRs) within Mid Sussex including 'Eastern Road Nature Reserve', 'Blunts and Paiges Wood' and 'Ardingly Reservoir'. None of the reasonable alternative sites are located in close proximity to these LNRs such that adverse impacts would be likely to occur as a result of the development. A negligible impact has been identified for all sites.

## C.8.6 Local Wildlife Sites

C.8.6.1 There are various Local Wildlife Sites (LWSs) located throughout Mid Sussex including 'Oaken Wood, Stony Plays and High Lines' LWS, 'Wickham Woods' LWS and 'Great Wood and Copyhold Hanger'. Sites 503, 556, 686, 736 and 1033 are located adjacent to or within close proximity to LWSs. The proposed development at these five sites may result in minor negative impacts on these LWSs due to increased development related threats and pressures.

## C.8.7 Priority Habitats

C.8.7.1 Priority habitats can be found throughout Mid Sussex and include deciduous woodland, grass moorland and traditional orchard. Sites 18, 198, 503, 556, 575, 601, 678, 688, 736, 740, 858, 984, 986, 1022, 1075, 1095, 1105 and 1106 coincide with areas of priority habitat. The proposed development at these sites could potentially result in the loss or degradation of these habitats and result in a minor negative impact on the overall presence of priority habitats across the Plan area.

Table C.8.1: Sites impact matrix for SA Objective 7 - Biodiversity

| Site Ref | Habitats Sites | SSSI | National Nature Reserves | Ancient Woodland | Veteran Trees | Local Nature Reserves | Local Wildlife Sites | Priority Habitat | Open Mosaic Habitat |
|----------|----------------|------|--------------------------|------------------|---------------|-----------------------|----------------------|------------------|---------------------|
| 13       | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 18       | 0              | 0    | 0                        | --               | --            | 0                     | 0                    | -                | 0                   |
| 19       | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 198      | -              | 0    | 0                        | -                | 0             | 0                     | 0                    | -                | 0                   |
| 210      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 503      | 0              | 0    | 0                        | -                | --            | 0                     | -                    | -                | 0                   |
| 508      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 526      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 543      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 556      | -              | 0    | 0                        | 0                | 0             | 0                     | -                    | -                | 0                   |
| 573      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 575      | 0              | 0    | 0                        | --               | 0             | 0                     | 0                    | -                | 0                   |
| 601      | 0              | 0    | 0                        | --               | 0             | 0                     | 0                    | -                | 0                   |
| 617      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 631      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 678      | 0              | 0    | 0                        | --               | 0             | 0                     | 0                    | -                | 0                   |
| 686      | -              | -    | 0                        | -                | 0             | 0                     | -                    | 0                | 0                   |
| 688      | -              | 0    | 0                        | --               | --            | 0                     | 0                    | -                | 0                   |
| 736      | 0              | 0    | 0                        | --               | 0             | 0                     | -                    | -                | 0                   |
| 740      | 0              | 0    | 0                        | --               | --            | 0                     | 0                    | -                | 0                   |
| 743      | 0              | 0    | 0                        | -                | 0             | 0                     | 0                    | 0                | 0                   |
| 784      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 789      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 799      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 830      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 844      | 0              | 0    | 0                        | -                | 0             | 0                     | 0                    | 0                | 0                   |
| 858      | 0              | 0    | 0                        | -                | 0             | 0                     | 0                    | -                | 0                   |
| 984      | -              | 0    | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 986      | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 1003     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1018     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1020     | 0              | 0    | 0                        | -                | 0             | 0                     | 0                    | 0                | 0                   |
| 1022     | 0              | 0    | 0                        | --               | 0             | 0                     | 0                    | -                | 0                   |
| 1026     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1030     | -              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1063     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1075     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 1095     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 1101     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1105     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 1106     | 0              | +/-  | 0                        | 0                | 0             | 0                     | 0                    | -                | 0                   |
| 1120     | 0              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1121     | -              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |
| 1123     | -              | 0    | 0                        | 0                | 0             | 0                     | 0                    | 0                | 0                   |

## C.9 SA Objective 8 - Landscape

### C.9.1 High Weald AONB

C.9.1.1 High Weald AONB comprises a large proportion of the northern area of Mid Sussex District. Sites 198, 984 and 1106 are located within the High Weald AONB and have been identified as having the potential to have a 'moderate impact' on the AONB upon development. A major negative impact on this designated landscape could therefore be expected for these sites.

### C.9.2 South Downs National Park

C.9.2.1 South Downs National Park comprises a large proportion of the southern area of Mid Sussex. Sites 13, 19, 575, 799, 986, 1022 ~~and~~, 1095 ~~and 1105~~ are located in close proximity to the National Park and are identified to be within areas where there is potential for new development to alter the setting of the landscape. A minor negative impact on the setting of this landscape could therefore be expected at these sites.

### C.9.3 Landscape Capacity

C.9.3.1 Landscape capacity is defined as "*the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type*"<sup>4</sup>.

C.9.3.2 Site 503 is located in an area identified as having 'medium/high' landscape capacity, and therefore a minor positive impact on the local landscape could occur, owing to the land parcel being able to accommodate change without significant impacts on the landscape quality and characteristics.

C.9.3.3 Site 574 is located within an area identified as having 'medium' landscape capacity, which is deemed to likely have a negligible impact on the landscape setting upon development.

C.9.3.4 36 of the 44 reasonable alternative sites are located in areas of 'negligible-low', 'low' or 'low/medium' landscape capacity where development within these areas could have the potential to significantly impact landscape character and setting. The proposed development at these sites could therefore be expected to have a minor negative impact on the landscape.

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<sup>4</sup> Natural England (2013) The Countryside Agency Topic Paper 6: Techniques and Criteria for judging capacity and sensitivity. Available at: <http://publications.naturalengland.org.uk/publication/5146500464115712> [Date Accessed: 27/01/22]

C.9.3.5 Sites 210, 631, 678, 784, 1121 and 1123 are located outside of the landscape capacity study area and therefore, the landscape capacity is unknown at these sites.

## C.9.4 Country Park

C.9.4.1 There are various Country Parks within Mid Sussex including 'Worth Way', 'Forest Way' and a small proportion of Country Parks 'Tilgate Park' and 'Ditchling Common'. Sites 18, 686 and 688 are located adjacent to or in close proximity to 'Worth Way' Country Park, where there is potential for the proposed development to have a minor negative impact on the setting of the country park.

## C.9.5 Alter Views for PRow Network Users

C.9.5.1 The development proposed at 33 of the 44 reasonable alternative sites are located in the vicinity of Mid Sussex's PRow network, and the development of such sites could potentially alter the views of countryside or open space currently experienced by the users of these footpaths. Therefore, a minor negative impact on the local landscape could be expected at these 33 sites.

C.9.5.2 Sites 210, 508, 556, 573, 617, 686, 984, 1101, 1106, 1121 and 1123 are separated from PRow by existing built form, and their development would therefore be unlikely to significantly alter views experienced by PRow users.

## C.9.6 Increased Risk of Coalescence

C.9.6.1 Sites 18, 575, 736, 799, 1018, 1022, 1063, 1095 and 1105 are situated between the existing communities of Mid Sussex such as Sayers Common and Albourne. Development of these sites could potentially lead to a loss of separation between settlements, and therefore potentially have minor negative impacts in relation to coalescence.

## C.9.7 Urban Sprawl

C.9.7.1 32 of the 44 reasonable alternative sites lie outside of existing settlements within Mid Sussex. Development of these sites could increase the risk of urban sprawl and therefore a minor negative impact on landscape could be expected.

## C.9.8 Multi-functional Greenspace

C.9.8.1 19 of the 44 reasonable alternative sites are located within 300m of multi-functional greenspace which would improve accessibility to the countryside and open spaces for site end users. Therefore, a minor positive impact on landscape could be expected at these sites.



## C.9.9 Tree Preservation Order

C.9.9.1 A Tree Preservation Order (TPO) is an order made by local authorities in England to protect certain trees, groups of trees or areas of woodland. Sites 18, 210 and 740 coincide with areas of TPOs and/or individual trees designated as TPO protected. Therefore, these sites could potentially directly harm these protected trees through development related threats and pressures and result in a minor negative impact on landscape setting.

Table C.9.1: Sites impact matrix for SA Objective 8 - Landscape

| Site Ref | High Weald AONB | South Downs National Park | Landscape Capacity | Country Park | Alter Views for PRoW Network Users | Increased Risk of Coalescence/ Encroachment | Multi-functional Greenspace | Tree Preservation Order |
|----------|-----------------|---------------------------|--------------------|--------------|------------------------------------|---|-----------------------------|-------------------------|
| 13       | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 18       | 0               | 0                         | -                  | -            | -                                  | -   | 0                           | -                       |
| 19       | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 198      | --              | 0                         | 0                  | 0            | -                                  | -   | +                           | 0                       |
| 210      | 0               | 0                         | +/-                | 0            | 0                                  | 0   | 0                           | -                       |
| 503      | 0               | 0                         | +                  | 0            | -                                  | -   | 0                           | 0                       |
| 508      | 0               | 0                         | 0-                 | 0            | 0                                  | 0   | +                           | 0                       |
| 526      | 0               | 0                         | -                  | 0            | -                                  | 0   | +                           | 0                       |
| 543      | 0               | 0                         | -                  | 0            | -                                  | 0   | +                           | 0                       |
| 556      | 0-              | 0                         | -                  | 0            | 0                                  | -   | 0                           | 0                       |
| 573      | 0               | 0                         | 0                  | 0            | 0                                  | -   | +                           | 0                       |
| 575      | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 601      | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 617      | 0               | 0                         | -                  | 0            | 0                                  | -   | 0                           | 0                       |
| 631      | 0               | 0                         | +/-                | 0            | -                                  | -   | +                           | 0                       |
| 678      | 0               | 0                         | +/-                | 0            | -                                  | -   | 0                           | 0                       |
| 686      | 0               | 0                         | -                  | -            | 0                                  | -   | 0                           | 0                       |
| 688      | 0               | 0                         | 0-                 | -            | -                                  | -   | 0                           | 0                       |
| 736      | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 740      | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | -                       |
| 743      | 0               | 0                         | -                  | 0            | -                                  | 0   | 0                           | 0                       |
| 784      | 0               | 0                         | +/-                | 0            | -                                  | -   | +                           | 0                       |
| 789      | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 799      | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 830      | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 844      | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 858      | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 984      | --              | 0                         | 0                  | 0            | 0                                  | 0   | +                           | 0                       |
| 986      | 0               | -                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 1003     | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 1018     | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1020     | 0               | 0                         | -                  | 0            | -                                  | 0   | +                           | 0                       |
| 1022     | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1026     | 0               | 0                         | -                  | 0            | -                                  | 0   | +                           | 0                       |
| 1030     | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1063     | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1075     | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |

| Site Ref | High Weald AONB | South Downs National Park | Landscape Capacity | Country Park | Alter Views for PROW Network Users | Increased Risk of Coalescence/ Encroachment | Multi-functional Greenspace | Tree Preservation Order |
|----------|-----------------|---------------------------|--------------------|--------------|------------------------------------|---|-----------------------------|-------------------------|
| 1095     | 0               | -                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1101     | 0               | 0                         | -                  | 0            | 0                                  | 0   | 0                           | 0                       |
| 1105     | 0               | 0                         | -                  | 0            | -                                  | -   | +                           | 0                       |
| 1106     | -               | 0                         | -                  | 0            | 0                                  | 0   | 0                           | 0                       |
| 1120     | 0               | 0                         | -                  | 0            | -                                  | -   | 0                           | 0                       |
| 1121     | 0               | 0                         | +/-                | 0            | 0                                  | 0   | +                           | 0                       |
| 1123     | 0               | 0                         | +/-                | 0            | 0                                  | 0   | +                           | 0                       |

## C.10 SA Objective 9 – Cultural Heritage

### C.10.1 Listed Buildings (Grades I, II\* and II)

C.10.1.1 There are many Listed Buildings scattered throughout Mid Sussex. The proposed development at Sites 13, 18, 19, 526, [556](#), 575, 601, 678, 789, 736, 799, 844, 1063 and 1120 are located within close proximity to a Listed Building (Grades I, II\* and II) and have been identified to have the potential to cause 'medium' or 'high' impact on these heritage assets including 'Langton Grange', 'Wickham Farmhouse' and 'Hurstpierpoint College'.

C.10.1.2 The remaining 31 sites are identified as being unlikely to have significant impacts on the setting of any Listed Building.

### C.10.2 Conservation Area

C.10.2.1 Mid Sussex contains 36 Conservation Areas (CAs). Sites 13, 19, 526, 575, 844, 986, 1095 and 1120 are located in close proximity to these CAs and have been identified to have the potential to cause 'high' impact on their settings. Therefore, minor negative impacts on CAs could be expected upon development of these sites.

C.10.2.2 The remaining 36 sites are identified as being unlikely to have significant impacts on any CA.

### C.10.3 Scheduled Monument

C.10.3.1 The 44 reasonable alternative sites are not located in close proximity to any Scheduled Monument (SM). The proposed development at all of the reasonable alternative sites are likely to have negligible impacts on SMs.

## C.10.4 Registered Park and Gardens

C.10.4.1 There are nine Registered Parks and Gardens (RPGs) within the Mid Sussex district, including 'The High Beeches', 'Stonehurst' and 'Heaselands' RPGs. Site 736 is located approximately 500m from 'Heaselands' RPG and, being a significantly large site, the proposed development at this site could potentially have a minor negative impact on the setting of this RPG. Site 556 is located approximately 15m (across the road) from 'Borde Hill' RPG. The proposed development at this site could potentially have a minor negative impact on the setting of this RPG.

C.10.4.2 The remaining reasonable alternative sites are deemed unlikely to have a significant impact on the setting of any RPG.

## C.10.5 Archaeology

C.10.5.1 Sites 19, 503, 556, 617, 686, 688, 736, 1022, 1075, 1101, 1105 and 1120 have been identified as having the potential to have moderate impacts on archaeological assets, and therefore, for the purposes of this assessment a minor negative impact is recorded.

C.10.5.2 The remaining 32 sites are deemed unlikely to have a significant impact on archaeological sites and have therefore been assessed as negligible. However, archaeological impact assessments and other desk studies would provide further information regarding potential archaeological assets on a site-by-site basis [if required](#).

Table C.10.1: Sites impact matrix for SA Objective 9 - Cultural Heritage

| Site Ref | Listed Buildings (Grades I, II* and II) | Conservation Area | Scheduled Monument | Registered Park and Gardens | Archaeology |
|----------|---|-------------------|--------------------|-----------------------------|-------------|
| 13       | -                                       | -                 | 0                  | 0                           | 0           |
| 18       | -                                       | 0                 | 0                  | 0                           | 0           |
| 19       | -                                       | -                 | 0                  | 0                           | -           |
| 198      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 210      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 503      | 0                                       | 0                 | 0                  | 0                           | -           |
| 508      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 526      | -                                       | -                 | 0                  | 0                           | 0           |
| 543      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 556      | -                                       | 0                 | 0                  | -                           | -           |
| 573      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 575      | -                                       | -                 | 0                  | 0                           | 0           |
| 601      | -                                       | 0                 | 0                  | 0                           | 0           |
| 617      | 0                                       | 0                 | 0                  | 0                           | -           |
| 631      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 678      | -                                       | 0                 | 0                  | 0                           | 0           |
| 686      | 0                                       | 0                 | 0                  | 0                           | -           |
| 688      | 0                                       | 0                 | 0                  | 0                           | -           |
| 736      | -                                       | 0                 | 0                  | -                           | -           |
| 740      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 743      | 0                                       | 0                 | 0                  | 0                           | 0           |

| Site Ref | Listed Buildings (Grades I, II* and II) | Conservation Area | Scheduled Monument | Registered Park and Gardens | Archaeology |
|----------|---|-------------------|--------------------|-----------------------------|-------------|
| 784      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 789      | -                                       | 0                 | 0                  | 0                           | 0           |
| 799      | -                                       | 0                 | 0                  | 0                           | 0           |
| 830      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 844      | -                                       | -                 | 0                  | 0                           | 0           |
| 858      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 984      | 0                                       | 0                 | 0                  | 0                           | 0           |
| 986      | 0                                       | -                 | 0                  | 0                           | 0           |
| 1003     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1018     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1020     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1022     | 0                                       | 0                 | 0                  | 0                           | -           |
| 1026     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1030     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1063     | -                                       | 0                 | 0                  | 0                           | 0           |
| 1075     | 0                                       | 0                 | 0                  | 0                           | -           |
| 1095     | 0                                       | -                 | 0                  | 0                           | 0           |
| 1101     | 0                                       | 0                 | 0                  | 0                           | -           |
| 1105     | 0                                       | 0                 | 0                  | 0                           | -           |
| 1106     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1120     | -                                       | -                 | 0                  | 0                           | -           |
| 1121     | 0                                       | 0                 | 0                  | 0                           | 0           |
| 1123     | 0                                       | 0                 | 0                  | 0                           | 0           |

## C.11 SA Objective 10 – Climate Change and Transport

### C.11.1 AQMA

C.11.1.1 There is only one AQMA located within the Plan area, 'Mid Sussex AQMA No. 1'. All reasonable alternative sites, with the exception of Site 210, are located over 200m from any AQMA and therefore are located away from major sources of traffic related air pollution. Minor positive impacts on climate change and transport could be expected as these 41 sites are not expected to contribute further to areas generally associated with traffic congestion.

C.11.1.2 Sites 210 and 1101 are located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at these two sites would be likely to locate site end users in areas of existing poor air quality and may exacerbate existing air quality issues within the AQMA. A minor negative impact on local air quality would be expected.

### C.11.2 Main Road

C.11.2.1 Various main roads pass through the Mid Sussex District, including the A272, A23 and A264. Sites 18, 210, 526, 543, 601, 617, 631, 740, 784, 736, 844, 984, 1022, 1095, 1101, 1105, 1106 and 1120 are located within 200m of a main road. The proposed development at these sites could potentially have a minor negative impact on transport related emissions, through potentially increasing traffic congestion in the local areas surrounding the sites.

C.11.2.2 The remaining reasonable alternative sites are located over 200m from a main road and therefore, the proposed development at these sites would be expected to have a minor positive impact on traffic and subsequent emissions.

### C.11.3 Bus Services

C.11.3.1 Mid Sussex is a largely rural district where settlements experience varying levels of public transport provision. Sites 789, 1003, 1020, 1030, 1105, 1120, 1121 and 1123 have been identified as having the potential for 'excellent' bus transport access, and it is therefore expected that the proposed development at these sites will have a major positive impact on access to sustainable transport via bus services.

C.11.3.2 Sites 210, 573, 601, 631, 686, 688, 743, 784, 830, 984, 986, 1018, 1022, 1026, 1063, 1075, 1095, 1101 and 1106 are identified as having the potential for 'good' bus transport access. The proposed development at these sites would therefore be expected to have a minor positive impact on a on access to sustainable transport via bus services.

C.11.3.3 Sites 13, 18, 19, 198, 503, 508, 526, 543, 556, 575, 617, 740, 799, 844 and 858 are identified as having the potential to have 'fair' bus transport access. The proposed development is therefore expected to have a negligible impact on access to sustainable transport via bus services.

C.11.3.4 Sites 678 and 736 are deemed have the potential for 'poor' bus transport access. The proposed development at these two sites could therefore expected to have a minor negative impact on access to sustainable transport via bus services.

## C.11.4 Railway Station

C.11.4.1 There are two railway lines running through Mid Sussex from north to south, with various train stations along them including Haywards Heath and Burgess Hill with links to major cities such as London and Brighton, as well as smaller towns. 37 of the 44 reasonable alternative sites are located outside of the sustainable target distance of a 15-minute walk or cycle (1.2km) from a railway station, and therefore the proposed development at these sites will potentially have a minor negative impact on the site end users' access to rail services.

C.11.4.2 Sites 210, 573, 1022, 1030, 1106, 1121 and 1123 are located within this target distance and are therefore expected to have a major positive impact on sustainable access to rail services.

## C.11.5 Public Transport Access to Local Services

C.11.5.1 Local services include superstores, services and facilities provided by town centres and high street shopping centres. Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1101, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.

C.11.5.2 The remaining sites are not located within this target distance to local services and are therefore expected to have minor negative impacts on transport and accessibility.

## C.11.6 Pedestrian Access to Local Services

C.11.6.1 Sites 13, 210, 1101, 1121 and 1123 are located within the sustainable target distance of a 15-minute walk/cycle from local services. The proposed development at these sites would therefore be expected to have a major positive impact on accessibility to these services.

C.11.6.2 The remaining 39 reasonable alternative sites are not located within this target distance to local services and therefore the proposed development at these sites are expected to potentially have a major-minor negative impact on accessibility to these vital services.

## C.11.7 Pedestrian Access to Convenience Store

C.11.7.1 Sites 13, 198, 210, 526, 617, 631, 784, 736, 984, 1020, 1030, 1095, 1101, 1105, 1106, 1120, 1121 and 1123 are within the sustainable target distance of a 15-minute walk from a convenience store and therefore the proposed development at these sites are expected to have a major positive impact on accessibility to these facilities.

C.11.7.2 The remaining 26 reasonable alternative sites are located outside of this target distance to a convenience store and therefore the proposed development at these sites would be expected to have a minor negative impact on future residents' accessibility to these facilities.

Table C.11.1: Sites impact matrix for SA Objective 10 - Climate Change and Transport

| Site Ref | AQMA | Main Road | Public Transport Access via bus services | Railway Station | Public Transport Access to Local Services | Pedestrian Access to Local Services | Pedestrian Access to Convenience Store |
|----------|------|-----------|--|-----------------|---|-------------------------------------|--|
| 13       | +    | +         | 0  | -               | +   | ++                                  | ++                                     |
| 18       | +    | -         | 0  | -               | -   | -                                   | -                                      |
| 19       | +    | +         | 0  | -               | -   | -                                   | -                                      |
| 198      | +    | +         | 0  | -               | -   | -                                   | ++                                     |
| 210      | -    | -         | +  | ++              | +   | ++                                  | ++                                     |
| 503      | +    | +         | 0  | -               | -   | -                                   | -                                      |
| 508      | +    | +         | 0  | -               | +   | -                                   | -                                      |
| 526      | +    | -         | 0  | -               | -   | -                                   | ++                                     |
| 543      | +    | -         | 0  | -               | -   | -                                   | -                                      |
| 556      | +    | +         | 0  | -               | +   | -                                   | -                                      |
| 573      | +    | +         | +  | ++              | -   | -                                   | -                                      |
| 575      | +    | +         | 0  | -               | -   | -                                   | -                                      |
| 601      | +    | -         | +  | -               | -   | -                                   | -                                      |
| 617      | +    | -         | 0  | -               | -   | -                                   | ++                                     |
| 631      | +    | -         | +  | -               | -   | -                                   | ++                                     |
| 678      | +    | +         | -  | -               | -   | -                                   | -                                      |
| 686      | +    | +         | +  | -               | -   | -                                   | -                                      |
| 688      | +    | +         | +  | -               | -   | -                                   | -                                      |
| 736      | +    | -         | -  | -               | -   | -                                   | ++                                     |
| 740      | +    | -         | 0  | -               | -   | -                                   | -                                      |
| 743      | +    | +         | +  | -               | -   | -                                   | -                                      |
| 784      | +    | -         | +  | -               | -   | -                                   | ++                                     |
| 789      | +    | +         | ++                                       | -               | -   | -                                   | -                                      |
| 799      | +    | +         | 0  | -               | -   | -                                   | -                                      |
| 830      | +    | +         | +  | -               | -   | -                                   | -                                      |
| 844      | +    | -         | 0  | -               | -   | -                                   | -                                      |
| 858      | +    | +         | 0  | -               | +   | -                                   | -                                      |
| 984      | +    | -         | +  | -               | +   | -                                   | ++                                     |
| 986      | +    | +         | +  | -               | -   | -                                   | -                                      |
| 1003     | +    | +         | ++                                       | -               | -   | -                                   | -                                      |
| 1018     | +    | +         | +  | -               | -   | -                                   | -                                      |
| 1020     | +    | +         | ++                                       | -               | -   | -                                   | ++                                     |
| 1022     | +    | -         | +  | ++              | -   | -                                   | -                                      |
| 1026     | +    | +         | +  | -               | -   | -                                   | -                                      |

[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)  
[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)  
[LC 045\\_Appendix\\_C\\_Site Assessments\\_11\\_211022LB.docx](#)

| Site Ref | AQMA | Main Road | Public Transport Access via bus services | Railway Station | Public Transport Access to Local Services | Pedestrian Access to Local Services | Pedestrian Access to Convenience Store |
|----------|------|-----------|--|-----------------|---|-------------------------------------|--|
| 1030     | +    | +         | ++                                       | ++              | +   | -                                   | ++                                     |
| 1063     | +    | +         | +  | -               | -   | -                                   | -                                      |
| 1075     | +    | +         | +  | -               | +   | -                                   | -                                      |
| 1095     | +    | -         | +  | -               | -   | -                                   | ++                                     |
| 1101     | -    | -         | +  | ++              | +   | ++                                  | ++                                     |
| 1105     | +    | -         | ++                                       | -               | -   | -                                   | ++                                     |
| 1106     | +    | -         | +  | -               | -   | -                                   | ++                                     |
| 1120     | +    | -         | 0  | -               | -   | -                                   | ++                                     |
| 1121     | +    | +         | ++                                       | ++              | +   | ++                                  | ++                                     |
| 1123     | +    | +         | ++                                       | ++              | +   | ++                                  | ++                                     |



## C.12 SA Objective 11 – Energy and Waste

### C.12.1 Increase in Household Waste Generation

- C.12.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent.
- C.12.1.2 Sites 736, 740, 799 and 1105 are proposed for the development of more than 1,307 dwellings. The proposed development at these four sites could potentially result in a significant increase household waste generation, by more than 1% in comparison to current levels, which could lead to major negative impacts on waste generation within the Plan area.
- C.12.1.3 Sites 19, 503, 575, 601, 678, 686, 688, 986, 1018, 1022, 1075, 1095, 1120 and 1123 are proposed for the development of between 131 and 1,307 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.12.1.4 24 of the reasonable alternative sites are proposed for the development of 131 dwellings or less. The proposed development at these sites would be expected to have negligible impacts on household waste generation in comparison to current levels.
- C.12.1.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The potential increase in waste production as a result of the proposed development at these two sites is uncertain.

### C.12.2 Increase in Energy Consumption Related GHG Emissions

- C.12.2.1 Residential-led development is likely to result in an increase in energy related GHG emissions through use of fossil fuel produced electricity, to some extent.
- C.12.2.2 Sites 18, 503, 575, 601, 617, 678, 686, 688, 736, 740, 799, 830, 844, 986, 1003, 1018, 1022, 1075, 1095, 1105, 1120, 1121 and 1123 are proposed for the development of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.
- C.12.2.3 Site 984 is proposed for development of eight dwellings, which would be expected to result in a negligible impact on GHG emissions relating to energy consumption.
- C.12.2.4 The remaining 18 reasonable alternative sites are proposed for the development of 10 dwellings or more. It is therefore expected that the proposed development at these sites

would likely have a minor negative impact on GHG emissions relating to energy consumption.

- C.12.2.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The potential increase in GHG emissions as a result of the proposed development at these two sites is uncertain.

*Table C.12.1: Sites impact matrix for SA Objective 11 - Energy and Waste*

| Site Ref | Increase in Household Waste | Increase in Energy Consumption |
|----------|-----------------------------|--------------------------------|
| 13       | 0                           | -                              |
| 18       | -                           | --                             |
| 19       | 0                           | -                              |
| 198      | 0                           | -                              |
| 210      | 0                           | -                              |
| 503      | -                           | --                             |
| 508      | 0                           | -                              |
| 526      | 0                           | -                              |
| 543      | 0                           | -                              |
| 556      | 0                           | -                              |
| 573      | 0                           | -                              |
| 575      | -                           | --                             |
| 601      | -                           | --                             |
| 617      | 0                           | --                             |
| 631      | 0                           | -                              |
| 678      | -                           | --                             |
| 686      | -                           | --                             |
| 688      | -                           | --                             |
| 736      | --                          | --                             |
| 740      | --                          | --                             |
| 743      | 0                           | -                              |
| 784      | 0                           | -                              |
| 789      | 0                           | -                              |
| 799      | --                          | --                             |
| 830      | 0                           | --                             |
| 844      | 0                           | --                             |
| 858      | 0                           | -                              |
| 984      | 0                           | 0                              |
| 986      | -                           | --                             |
| 1003     | 0                           | --                             |
| 1018     | -                           | --                             |
| 1020     | 0                           | -                              |
| 1022     | -                           | --                             |
| 1026     | 0                           | -                              |
| 1030     | 0                           | -                              |
| 1063     | 0                           | -                              |
| 1075     | -                           | --                             |
| 1095     | -                           | --                             |
| 1101     | +/-                         | +/-                            |
| 1105     | --                          | --                             |
| 1106     | +/-                         | +/-                            |
| 1120     | -                           | --                             |
| 1121     | 0                           | --                             |

~~Appendix E Lepus Consulting Site Assessment 2022 tracked changes~~  
~~Appendix E Lepus Consulting Site Assessment 2022 tracked changes~~  
~~LC 045\_Appendix\_C\_Site Assessments\_11\_211022LB.docx~~

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|      |   |    |
|------|---|----|
| 1123 | - | -- |
|------|---|----|

## C.13 SA Objective 12 – Water Resources

### C.13.1 Watercourse

C.13.1.1 There are various major and minor watercourses within the Plan area, including the River Ouse and River Medway and related tributaries. Sites 18, 198, 556, 575, 678, 688, 736, 740, 830, 1003, 1022, 1030, 1075, 1095 and 1105 are located within 200m of a watercourse and therefore the proposed development at these sites could potentially increase the risk of contamination of these watercourses during construction and occupation. A minor negative impact on watercourse quality could therefore be expected at these sites upon development.

### C.13.2 Groundwater SPZ

C.13.2.1 Within Mid Sussex, SPZs are located to the south and the north east of the district. The 44 reasonable alternative sites do not coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. The proposed development these sites could therefore be expected to have a negligible impact on protected groundwater resources.

Table C.13.1: Sites impact matrix for SA Objective 12 - Water Resources

| Site Ref | Watercourse | SPZ |
|----------|-------------|-----|
| 13       | 0           | 0   |
| 18       | -           | 0   |
| 19       | 0           | 0   |
| 198      | -           | 0   |
| 210      | 0           | 0   |
| 503      | 0           | 0   |
| 508      | 0           | 0   |
| 526      | 0           | 0   |
| 543      | 0           | 0   |
| 556      | -           | 0   |
| 573      | 0           | 0   |
| 575      | -           | 0   |
| 601      | 0           | 0   |
| 617      | 0           | 0   |
| 631      | 0           | 0   |
| 678      | -           | 0   |
| 686      | 0           | 0   |
| 688      | -           | 0   |
| 736      | -           | 0   |
| 740      | -           | 0   |
| 743      | 0           | 0   |
| 784      | 0           | 0   |
| 789      | 0           | 0   |
| 799      | 0           | 0   |
| 830      | -           | 0   |
| 844      | 0           | 0   |
| 858      | 0           | 0   |
| 984      | 0           | 0   |
| 986      | 0           | 0   |
| 1003     | -           | 0   |
| 1018     | 0           | 0   |
| 1020     | 0           | 0   |
| 1022     | -           | 0   |
| 1026     | 0           | 0   |
| 1030     | -           | 0   |
| 1063     | 0           | 0   |
| 1075     | -           | 0   |
| 1095     | -           | 0   |
| 1101     | 0           | 0   |
| 1105     | -           | 0   |
| 1106     | 0           | 0   |
| 1120     | 0           | 0   |
| 1121     | 0           | 0   |
| 1123     | 0           | 0   |

## C.14 SA Objective 13 – Economic Regeneration

### C.14.1 Pedestrian Access to Local Services

C.14.1.1 Good and sustainable access to local services such as a superstore, a town centre or a high street shopping centre, will likely lead to economic stimulation and regeneration where an increase in footfall could positively impact the local economy and provide new job opportunities for local residents. Sites 13, 210, 1101, 1121 and 1123 are located within the target distance of a 15-minute walk/cycle from local services and therefore the proposed development at this site is expected to have a major positive impact on accessibility.

C.14.1.2 The remaining 39 reasonable alternative sites are not located within this sustainable target distance to local services, and therefore the proposed development at these sites would be expected to have a minor negative impact on accessibility.

### C.14.2 Public Transport Access to Local Services

C.14.2.1 Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1101, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport and therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.

C.14.2.2 The remaining 33 sites are not located within this sustainable target distance from local services and are therefore expected to potentially have a minor negative impact on transport and accessibility.

Table C.14.1: Sites impact matrix for SA Objective 13 - Economic Regeneration

| Site Ref | Pedestrian access to local services | Public transport access to local services |
|----------|-------------------------------------|---|
| 13       | ++                                  | +   |
| 18       | -                                   | -   |
| 19       | -                                   | -   |
| 198      | -                                   | -   |
| 210      | ++                                  | +   |
| 503      | -                                   | -   |
| 508      | -                                   | +   |
| 526      | -                                   | -   |
| 543      | -                                   | -   |
| 556      | -                                   | +   |
| 573      | -                                   | -   |
| 575      | -                                   | -   |
| 601      | -                                   | -   |
| 617      | -                                   | -   |
| 631      | -                                   | -   |
| 678      | -                                   | -   |
| 686      | -                                   | -   |
| 688      | -                                   | -   |
| 736      | -                                   | -   |
| 740      | -                                   | -   |
| 743      | -                                   | -   |
| 784      | -                                   | -   |
| 789      | -                                   | -   |
| 799      | -                                   | -   |
| 830      | -                                   | -   |
| 844      | -                                   | -   |
| 858      | -                                   | +   |
| 984      | -                                   | +   |
| 986      | -                                   | -   |
| 1003     | -                                   | -   |
| 1018     | -                                   | -   |
| 1020     | -                                   | -   |
| 1022     | -                                   | -   |
| 1026     | -                                   | -   |
| 1030     | -                                   | +   |
| 1063     | -                                   | -   |
| 1075     | -                                   | +   |
| 1095     | -                                   | -   |
| 1101     | ++                                  | +   |
| 1105     | -                                   | -   |
| 1106     | -                                   | -   |
| 1120     | -                                   | -   |
| 1121     | ++                                  | +   |
| 1123     | ++                                  | +   |

## C.15 SA Objective 14 – Economic Growth

### C.15.1 Employment Floorspace

C.15.1.1 The provision of employment floorspace within Mid Sussex would provide various benefits to the local economy. Sites 18, 736, 740 and 799 are proposed for mixed-use developments where some land would be safeguarded for provision of employment floorspace which could help to provide site end users with local business and employment opportunities. Sites 1101 and 1106 are proposed for C2 use class development, which could provide some local employment opportunities. Therefore, a major positive impact on the local economy would be expected as a result of the proposed development at these six sites.

C.15.1.2 Sites 503, 743, 1022, 1121 and 1123 coincide with areas of current employment floorspace, such as agricultural businesses or golf courses. The proposed development at these sites could potentially result in the loss of these businesses, and consequently the employment opportunities they provide. Therefore, a minor negative impact could be expected following the proposed development at these sites.

C.15.1.3 The remaining reasonable alternative sites are proposed for residential use only and therefore are likely to have a negligible impact on economic growth through employment floorspace provision.

### C.15.2 Access to Primary Employment Locations

C.15.2.1 There are a range of employment locations within the Plan area within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. The 42 reasonable alternative locations for residential use are located within the sustainable target distance of 5km to key employment areas which would provide site end users with sustainable access to a range of employment opportunities capable of meeting their needs. Therefore, a minor positive impact on the local economy could be expected following the development of these sites.

C.15.2.2 Sites 1101 and 1106 are proposed for C2 development, and as such, have not been assessed for their access to employment. A negligible impact would be expected for these two sites.



Table C.15.1: Sites impact matrix for SA Objective 14 - Economic Growth

| Site Ref | Employment Floorspace Provision | Access to Primary Employment Location |
|----------|---------------------------------|---------------------------------------|
| 13       | 0                               | +                                     |
| 18       | ++                              | +                                     |
| 19       | 0                               | +                                     |
| 198      | 0                               | +                                     |
| 210      | 0                               | +                                     |
| 503      | -                               | +                                     |
| 508      | 0                               | +                                     |
| 526      | 0                               | +                                     |
| 543      | 0                               | +                                     |
| 556      | 0                               | +                                     |
| 573      | 0                               | +                                     |
| 575      | 0                               | +                                     |
| 601      | 0                               | +                                     |
| 617      | 0                               | +                                     |
| 631      | 0                               | +                                     |
| 678      | 0                               | +                                     |
| 686      | 0                               | +                                     |
| 688      | 0                               | +                                     |
| 736      | ++                              | +                                     |
| 740      | ++                              | +                                     |
| 743      | -                               | +                                     |
| 784      | 0                               | +                                     |
| 789      | 0                               | +                                     |
| 799      | ++                              | +                                     |
| 830      | 0                               | +                                     |
| 844      | 0                               | +                                     |
| 858      | 0                               | +                                     |
| 984      | 0                               | +                                     |
| 986      | 0                               | +                                     |
| 1003     | 0                               | +                                     |
| 1018     | 0                               | +                                     |
| 1020     | 0                               | +                                     |
| 1022     | -                               | +                                     |
| 1026     | 0                               | +                                     |
| 1030     | 0                               | +                                     |
| 1063     | 0                               | +                                     |
| 1075     | 0                               | +                                     |
| 1095     | 0                               | +                                     |
| 1101     | ++                              | 0                                     |
| 1105     | 0                               | +                                     |
| 1106     | ++                              | 0                                     |
| 1120     | 0                               | +                                     |
| 1121     | -                               | +                                     |
| 1123     | -                               | +                                     |

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