
27 September 2022

NOTE: There will be limited public access to observe the meeting. Admission is by ticket only, bookable by 4pm the day prior to the meeting via: committees@midsussex.gov.uk. Access is also available via a live stream through the [Mid Sussex District Council's YouTube channel](#).

Dear Councillor,

A meeting of **SCRUTINY COMMITTEE FOR PLANNING, ECONOMIC GROWTH AND NET ZERO** will be held in the **COUNCIL CHAMBER** at these offices on **WEDNESDAY, 5TH OCTOBER, 2022** at **7.00 pm** when your attendance is requested.

Yours sincerely,
KATHRYN HALL
Chief Executive

A G E N D A

	Pages
1. To note Substitutes in Accordance with Council Procedure Rule 4 - Substitutes at Meetings of Committees etc.	
2. To receive apologies for absence.	
3. To receive Declarations of Interests from Members in respect of any matter on the Agenda.	
4. To confirm the Minutes of the meeting of the Scrutiny Committee for Housing, Planning and Economic Growth held on 19 January and 11 May 2022.	3 - 8
5. To consider any items that the Chairman agrees to take as urgent business.	
6. District Plan Review and Update - Strategy and Non-Housing Site Policies.	9 - 206
7. Mid Sussex Net Zero Targets.	207 - 322

8. Scrutiny Committee for Planning, Economic Growth and Net Zero - **323 - 324**
Work Programme 2022/23.
9. Questions pursuant to Council Procedure Rule 10.2 due notice of
which has been given.

To: **Members of Scrutiny Committee for Planning, Economic Growth and Net Zero:**
Councillors N Walker (Chair), A Peacock (Vice-Chair), R Bates, M Belsey, P Brown,
R Clarke, P Coote, R Eggleston, B Forbes, S Hatton, J Henwood, C Laband, G Marsh,
J Mockford and R Whittaker

**Minutes of a meeting of Scrutiny Committee for Housing, Planning
and Economic Growth
held on Wednesday, 19th January, 2022
from 6.00 - 6.31 pm**

Present: N Walker (Chair)
A Peacock (Vice-Chair)

R Bates	P Coote	G Marsh
M Belsey	R Eggleston	J Mockford
A Bennett	B Forbes	R Webb
P Brown	C Laband	

Absent: Councillors E Coe-Gunnell White and S Hatton

Also Present: Councillors P Chapman, R Clarke, R de Mierre, A Eves,
I Gibson, S Hillier, J Knight, J Llewellyn-Burke, C Phillips,
R Salisbury and N Webster

**Also Present
as Cabinet
Members:** Councillor J Ash-Edwards

1 ROLL CALL AND VIRTUAL MEETING EXPLANATION.

The Chairman welcomed everyone to the meeting. The Solicitor to the Council provided information on the reasons for the virtual meeting and took the roll call.

**2 TO NOTE SUBSTITUTES IN ACCORDANCE WITH COUNCIL PROCEDURE
RULE 4 - SUBSTITUTES AT MEETINGS OF COMMITTEES ETC.**

Councillor Alison Bennett substituted for Councillor Hatton and Councillor Sweatman substituted for Councillor Coe-Gunnell White.

3 TO RECEIVE APOLOGIES FOR ABSENCE.

Apologies were received from Councillors Hatton and Coe-Gunnell White.

**4 TO RECEIVE DECLARATIONS OF INTERESTS FROM MEMBERS IN RESPECT
OF ANY MATTER ON THE AGENDA.**

None.

**5 TO CONFIRM THE MINUTES OF THE MEETING OF THE SCRUTINY
COMMITTEE FOR HOUSING, PLANNING AND ECONOMIC GROWTH HELD ON
20 JANUARY AND 28 APRIL 2021.**

The minutes of the meeting of the Committee held on 20 January and 28 April 2021 were agreed as a correct record. These were electronically signed by the Chairman.

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

None.

7 DISTRICT PLAN REVIEW AND UPDATE.

Judy Holmes, Assistant Chief Executive introduced the report. She reminded Members that the Council is obligated to review the District Plan by 2023 and that the review is a democratic and lengthy process, currently in the early stages. She highlighted that the Council has a duty to update the plan in order to avoid speculative and unplanned development, and the potential for the 5-year housing supply to be challenged by developers.

Sally Blomfield, Divisional Leader for Planning and Economy gave a high-level outline of the structure and content of the Draft District Plan Update, highlighting the significant changes and new policies.

The Chairman invited the Leader to speak.

The Leader thanked the officers for their detailed work on the District Plan Review. He advised it was beneficial for the document to be in public domain so it can be scrutinised. He requested a pause in the consideration of the proposals so that further work and lobbying can be undertaken due to the issues that impact on the Council's planning responsibilities. He advised that he is writing to the Secretary of State Michael Gove MP asking for the housing targets to be reset to reflect the environmental and infrastructure constraints of Mid Sussex. The levelling up White Paper is due shortly and he hopes the housing numbers for the South East will be reviewed. The Plan should maximise the number of brownfield and windfall sites, the unmet need from neighbouring authorities needs scrutiny, and the implications around the issue of water naturalness raised by Natural England needs further clarification. He concluded that it is essential to have a District Plan to prevent speculative development, it will ensure Mid Sussex is a good place to live but we must balance the number of new developments to provide the housing need whilst protecting the environment.

The Chairman advised that it would be sensible to defer the discussion on the review of the District Plan until additional work has been completed and the outcome of Government White Paper.

A Member raised a point of order with regard to the submission of an amendment to the recommendation. Tom Clark, Solicitor to the Council advised that no motion was currently under consideration. The Chairman invited the Vice-Chairman, Councillor Peacock to speak.

Councillor Peacock proposed a motion that the Committee agrees to defer the discussion of the District Plan Review so that further work and consideration can take place and the outcome of any change to Government policy can be known. This was seconded by Councillor Marsh.

Councillor Eggleston requested that the Members had an opportunity to review and consider the changes to the District Plan policies and evidence base. He proposed a motion, seconded by Councillor Alison Bennett that:

(A) That the Scrutiny Committee for Housing, Planning and Economic Growth (“the Committee”) establishes a working party to review: (i) the evidence for the proposed housing allocation in the Draft District Plan 2021-2038 (“the Plan”); (ii) the fundamental alterations to 10 major policies in the current District Plan and the addition of 6 new policies, and (iii) the appropriateness or otherwise of including the sites identified for development in the Plan, in whole or part and report its findings to the next appropriate meeting of the Committee with recommendations for adoption by the Committee and Council.

(B) That the Chief Executive writes to Secretary of State for Housing, Communities and Local Government setting out Mid Sussex District Council’s concern over the continued use of the “standard method” for calculating housing need and urging the Secretary of State to bring forward proposals to change the method so that it is more appropriate to the needs of the District.”

As the Leader had previously indicated his intention to write to the Secretary of State, discussion was held on the option to add paragraph A of Councillor Eggleston’s amendment to the motion proposed by the Vice-Chairman, therefore removing the need to have paragraph B above. Councillor Eggleston indicated agreement and the Chairman took the Committee to a vote on this proposal. The decision to amend the motion to add paragraph A above was approved with 8 in favour and 7 against.

Councillor Laband proposed a motion that the numbers of policies referred to in paragraph A of Councillor Eggleston’s amendment be removed. This was seconded by Councillor Mockford. Councillor Eggleston accepted the amendment to the current motion, however Vice-Chairman did not. The Chairman took the Committee to a vote on the Councillor Laband’s amendment. The amendment to the motion failed with 7 in favour and 8 against after the casting vote by the Chairman.

The Chairman took the Committee to a vote on the motion proposed by the Vice-Chairman as amended by Councillor Eggleston. The motion was approved with 9 in favour, 5 against.

RESOLVED

That the Scrutiny Committee:

- (i) the Committee agrees to defer the discussion of the District Plan Review so that further work and consideration can take place and the outcome of change to any Government policy is known,
- (ii) the Committee establishes a working party to review: (i) the evidence for the proposed housing allocation in the Draft District Plan 2021-2038 (“the Plan”); (ii) the fundamental alterations to 10 major policies in the current District Plan and the addition of 6 new policies, and (iii) the appropriateness or otherwise of including the sites identified for development in the Plan, in whole or part and report its findings to the next appropriate meeting of the Committee with recommendations for adoption by the Committee and Council.

**8 SCRUTINY COMMITTEE FOR HOUSING, PLANNING AND ECONOMIC GROWTH
- WORK PROGRAMME 2021/22.**

Tom Clark, Head of Regulatory Services introduced the Committee's Work Programme. He noted that currently there was no business scheduled for the next meeting and this would be updated as appropriate.

RESOLVED

The Committee noted the Committee's Work Programme as set out at paragraph 5 of the report.

**9 QUESTIONS PURSUANT TO COUNCIL PROCEDURE RULE 10.2 DUE NOTICE
OF WHICH HAS BEEN GIVEN.**

None.

The meeting finished at 6.31 pm

Chairman

**Minutes of a meeting of Scrutiny Committee for Housing, Planning
and Economic Growth
held on Wednesday, 11th May, 2022
from 7.35 - 7.36 pm**

Present: N Walker (Chairman)
A Peacock (Vice-Chair)

M Belsey
P Brown
R Clarke
P Coote

R Eggleston
B Forbes
J Henwood
C Laband

J Mockford
R Whittaker

Absent: Councillors R Bates, S Hatton and G Marsh

1 ELECTION OF CHAIRMAN.

Councillor Peacock nominated Councillor Walker as Chairman of the Committee for the 2022/23 Council year. This was seconded by Councillor Forbes and with no further nominations put forward, this was agreed.

RESOLVED

That Councillor Walker be elected Chairman of the Committee for the 2022/23 Council year.

2 APPOINTMENT OF VICE-CHAIRMAN.

Councillor Walker nominated Councillor Peacock as Vice-Chairman of the Committee for the 2022/23 Council year. This was seconded by Councillor Forbes and with no further nominations put forward, this was agreed.

RESOLVED

That Councillor Peacock be appointed Vice-Chairman of the Committee for the 2022/23 Council year.

3 TO CONSIDER ANY ITEMS THAT THE CHAIRMAN AGREES TO TAKE AS URGENT BUSINESS.

None.

The meeting finished at 7.36 pm

Chairman

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DISTRICT PLAN REVIEW AND UPDATE – STRATEGY AND NON-HOUSING SITE POLICIES

REPORT OF: Sally Blomfield – Assistant Director Planning and Sustainable Economy
Contact Officer: Andrew Marsh – Head of Planning Policy and Housing Enabling
Email: Andrew.Marsh@midsussex.gov.uk Tel: 01444 477488
Wards Affected: All
Key Decision: Yes
Report to: Scrutiny Committee for Planning, Economic Growth and Net Zero
5th October 2022

Purpose of Report

1. The Scrutiny Committee is requested to consider the scope of the District Plan Review, the draft revised District Plan Strategy and non-site-specific generic policies which apply to development across the district. The full suite documents for consultation including the draft revised District Plan (with the proposed site allocations) and supporting documents such as the Habitats Regulation Assessment and the Sustainability Appraisal including the Strategic Environmental Assessment, will be considered by this Scrutiny Committee at its meeting on 18 October.

Summary

2. This report:
 - Summarises why the District Plan adopted in 2018 needs to be reviewed, the process of updating it, and the Scope of the review (see Appendix 1);
 - Summarises the additional evidence undertaken since January 2022 including the work of the Member Working Group meetings;
 - Sets out the draft revised District Plan Strategy and non-housing site policies (see Appendix 2); and
 - Outlines the next steps.

Recommendations

3. **That the Scrutiny Committee for Housing, Planning and Economic Growth:**
 - (i) **Considers and comments on the Scope of the District Plan Review, the draft revised District Plan Strategy, and the draft non-housing site policies**
-

Background

4. The Mid Sussex District Plan 2014 – 2031 was adopted in March 2018. The adopted District Plan contained a commitment to review the plan (policy DP4: Housing), starting in 2021 with submission to the Secretary of State in 2023. The review and update of the District Plan has commenced.
5. The District Plan review process is carried out in two stages:
 - **Stage 1: Scope of the Review:** to review the policies within the adopted District Plan and determine whether they require an update

- **Stage 2: Update the District Plan:** to incorporate updated policies, and new policies, within an updated District Plan.
6. The Scope of the Review and a draft revised District Plan were published for consideration by Scrutiny Committee at its meeting in January 2022. At this meeting the Scrutiny Committee resolved to defer discussion until further work had been carried out on maximising brownfield and windfall sites, there was more clarity about the unmet need from neighbours and the impact of the Water Neutrality position affecting neighbouring authorities and to await the outcome of potential changes to the planning system being proposed by the Government. Relevant updates will be reported in the next Scrutiny Committee report.
 7. In January 2022, the Scrutiny Committee also resolved to establish a working party to “review the fundamental alterations to 10 major policies in the current District Plan and the addition of 6 new policies”. A politically balanced, cross-party Members Working Group was established and met four times to discuss proposed policies; the site selection methodology; the sites submitted to the council for allocation; and the sites proposed for allocation.
 8. This report presents details of the additional work undertaken; the outcome of the Member Working Group meetings; the Scope of the Review; the proposed draft revised strategy; and the proposed draft revised non-housing site Policies. This report does not include the housing allocation policies (the sites) or the associated sites evidence material required to support the allocations as these matters are scheduled to be considered by Scrutiny at its meeting on 18 October and these papers will be published alongside that report. Splitting the consideration of policies and sites in this way responds to Members concerns that sufficient time is allowed to enable robust scrutiny of this complex area of work. This is particularly important given the other items which are scheduled for consideration at the Scrutiny Committee meeting on 5 October.
 9. As noted above, the proposed Housing Site policies (the site allocations) will be the subject of the report scheduled for discussion by this Committee on 18th October 2022. The next report will include the full draft revised District Plan 2021- 2039 including the allocations, the proposed draft revised District Plan and full suite of legally required documents to support the Plan. At that meeting this Committee will be asked to recommend to Council that the draft revised District Plan and associated documentation be approved for Regulation 18 stage consultation.

Why Update the District Plan?

10. The planning system should be plan-led. An up-to-date District Plan should be in place to provide a vision for the future and address housing needs and other economic, social and environmental policies. An up-to-date plan is crucial in enabling the Council to:
 - maintain control of how to address housing need,
 - control the location of the proposed sites for development including securing infrastructure to provide certainty by ensure statutory providers know where, when and how much development is likely to be delivered,
 - place full weight on its policies when determining planning applications,
 - impose policy requirements to ensure sites deliver site-specific mitigation, infrastructure and facilities required to support housing development
 - secure a minimum 5-year supply. Without which, housing policies are deemed ‘out of date’ and the presumption in favour of sustainable development would apply resulting in speculative unwanted development.

11. In the period before the current District Plan was adopted in 2018, the Council could not demonstrate it was meeting its housing need and did not have a 5-year housing land supply. In this period, it is estimated that 3,000 unplanned, speculative dwellings on greenfield sites were developed as a direct result of due the Council not having a 5-year housing land supply. It cost the Council around £720k in unsuccessfully trying to prevent these sites coming forward. It is therefore vital that an up-to-date plan is in place.
12. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review Local Plans (such as the District Plan) every five years to ensure policies remain relevant and effectively address the needs of the local community. This is reflected in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), which set out the process that should be followed to review local plans. Reviews should be completed no later than five years from the adoption date of the Plan. The District Plan reaches its fifth anniversary in March 2023.

District Plan Review - Scope

13. Planning Practice Guidance states that policies age at different rates and that policies do not automatically go out-of-date at the 5-year point. However, dependant on changing circumstances and evidence, policies may be considered out-of-date and carry less weight when determining planning applications if they are more than 5-years old. Accordingly, the NPPF (paragraph 33) establishes two distinct phases of the process:
 - **Stage 1:** Review to assess whether elements of the plan need updating
 - **Stage 2:** Update as necessary
14. National policy and guidance set out the considerations and process of reviewing Local Plans. These considerations include:
 - Changing circumstances affecting the area, such as changes in housing, employment or other needs;
 - Relevant changes in national policy;
 - Whether the authority has a 5-year supply of deliverable housing sites;
 - Success of policies against indicators as set out in the Authority Monitoring Report;
 - Plan-making by other authorities, such as whether they can meet their housing need;
 - Any new social, environmental and economic priorities that may have arisen.
15. In addition, the review should be undertaken in the context that the NPPF requires Local Plans to be a minimum of 15-years from adoption. Given that there are a number of statutory processes that need to be completed before the updated District Plan is adopted (including two rounds of public consultation and examination in public by a Planning Inspector) it is estimated that adoption will take place in 2024. Therefore the plan will cover the period from 2024 to 2039 to ensure compliance with national policy.
16. Each of the existing District Plan policies has been reviewed in line with the requirements set out above. This has determined which policies are 'in scope' to be updated, and which do not require an update at this stage. Each of the policies have been categorised as follows:

- **No Update required:** The policy continues to comply with national policy and the evidence base has determined it is still effective as it stands
 - **Minor Update:** The Policy only requires minor amendments (such as factual updates) that do not change the overall meaning or direction of the policy.
 - **Major Update:** Changes in national policy or updated evidence suggests that an existing policy may require updating in full
 - **New Policies:** Changes in national policy or updated evidence suggests that a new policy is required
17. Stakeholders will be able to comment on the categorisation as part of the consultation process, which will help to refine the updated District Plan as it progresses through the formal stages to adoption.
18. The findings of the Review process are set out in Appendix 1. In total, of the currently adopted District Plan policies¹:
- 7 do not require any update;
 - 18 require minor factual/clarity updates;
 - 11 require a major update.
19. The findings at “Stage 1 - Scope of the Review” have informed the drafting of the draft revised District Plan. This includes an updated Plan Strategy to guide growth, and a range of updated and new policies to ensure the District Plan remains effective, in accordance with National Policy, and that full weight can continue to be applied when determining planning applications.
20. The proposed draft revised Strategy and Non-Housing Site Policies are attached in Appendix 2.

Updates since January 2022

21. Following the Scrutiny Committee’s resolution in January 2022, further work has been carried out on the policies in the draft District Plan.
22. The policies within Appendix 2 include amendments that have been made to the policies since January 2022 as a result of refinements to follow best practice or for clarity, and to take account of the work carried out by the Members’ Working Group.

Plan Strategy

Vision and Objectives

23. The purpose of the planning system is to contribute to the achievement of sustainable development. The preparation and implementation of plans should help deliver this.
24. The adopted Plan’s vision is:

“A thriving, attractive and resilient District, which is a highly sustainable and desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

¹ These figures have been updated since January 2022 as a result of further work, including that of the Member Working Group

25. The vision is still relevant; therefore, it is not proposed to update it in the updated draft revised District Plan.
26. The vision in the adopted plan was underpinned by four priority themes that promote the development of sustainable communities. These have now been amalgamated into three priority themes which reflect the NPPF:
 - **Environment:** Protecting and enhancing the natural, built, and historic environment;
 - **Economy:** Promoting economic vitality; and
 - **Social:** Ensuring cohesive, safe and healthy communities
27. Section 5 of the draft revised Plan sets out a range of strategic objectives for each of the themes and these remain relevant. The themes are in full accordance with the NPPF's objectives for delivering sustainable development through local plans.
28. In addition, in line with the revised NPPF (Paragraph 7) the draft Plan embeds the United Nations 17 "Sustainable Development Goals" (SDGs) and sets out how policies within the draft Plan will contribute to one or more of these goals. This also aligns with the approach taken in the Mis Sussex Sustainable Economy Strategy.

The draft revised District Plan Strategy

29. The adopted District Plan Strategy focuses development at the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encourages proportionate growth at other settlements to meet local needs and support the provision of local services. This spatial strategy informed the location of allocations in the District Plan and the Site Allocations DPD.
30. A fundamental part of the District Plan review has been to determine:
 - a. whether the existing strategy is still relevant given any changes to evidence or local circumstances; and
 - b. whether the current strategy can be maintained given the extended plan period; future predicted needs; and availability of sites.
31. The current strategy has been reviewed. Given the environmental and infrastructure constraints in some areas of the district, existing committed development (e.g. sites with planning permission and allocations within the adopted District Plan, Sites DPD or Neighbourhood Plans), and location of deliverable/sustainable sites with the potential for allocation, it is concluded some areas within the district have higher potential for further growth compared to others.
32. The findings of the evidence base indicates that, beyond existing commitments (i.e. current allocations):
 - There is limited further growth potential at East Grinstead and Haywards Heath, therefore the current strategy to focus growth to the towns cannot be sustained.
 - There is limited further growth potential at Area of Outstanding Natural Beauty (AONB) settlements. The previous District Plan strategy allowed for proportionate growth at all AONB settlements, due to changes to National policy cannot now be sustained.
 - There is, however, the potential for growth at some settlements not within the AONB. The extent of growth is dependent upon the characteristics of the settlements and the availability/size of potential sites at those locations.

33. Given the extended plan period to 2039, the extent of growth required in that period, and the aforementioned conclusions, it is clearly not possible to continue to plan in accordance with the currently adopted District Plan strategy. A revised Plan Strategy, to guide locations for growth to meet local needs, is therefore required.

34. The proposed revised draft Plan Strategy is based on four themes set out below.

- **Protection of Designated landscapes (such as AONB)**

Approximately 50% of the district is within the High Weald Area of Outstanding Natural Beauty. National planning policy and guidance is clear that great weight should be given to conserving and enhancing the landscape and scenic beauty of AONBs and its wildlife and cultural heritage. These areas along with National Parks and the Broads have the highest status of protection (NPPF, paragraph 176).

The adopted District Plan, Site Allocations DPD and Neighbourhood Plans allocate sites for housing and employment within the High Weald AONB to allow settlements within the AONB to grow and to support local services. However, national policy makes clear that the scale and extent of development should be limited.

The proposed strategy in the draft revised District Plan therefore aims to ensure designated landscapes such as the High Weald AONB are protected and growth in such settlements limited.

- **Making effective use of land**

National Planning Policy (NPPF, paragraph 119) promotes the use of previously developed land ('brownfield') wherever possible. Whilst opportunities for brownfield development in a rural district such as Mid Sussex are limited, the proposed draft Strategy in draft revised District Plan is to ensure that every opportunity to maximise development on such sites will be taken. In addition, where countryside sites are required, these should be developed at appropriate densities to ensure effective use is made of the land.

- **Growth at existing sustainable settlements where it continues to be sustainable to do so**

Opportunities will be taken to focus growth at settlements which are already sustainable; for instance, where there are a number of services and facilities within walking/cycling distance in accordance with the 20-minute neighbourhood principle. The adopted District Plan promoted this approach by focussing development at the three towns, then larger villages.

- **Opportunities for extensions to improve sustainability of existing settlements which are currently less sustainable**

The adopted District Plan strategy allowed for only limited growth at settlements that are deemed less sustainable (i.e. those with few or no local services and facilities). However, there are opportunities for growth at such settlements where there are sufficient smaller sites or sites sufficiently large enough to provide supporting new services and facilities which would be of benefit to both new residents and the existing community.

For instance, if there is a critical mass a new site allocation will provide its own on-site facilities and services – such as provision of a new primary school, health facilities, neighbourhood centres/small-scale retail, employment and open space/sports provision. Provision of such facilities in settlements which are lacking (or have no such provision) will create a more sustainable settlement.

This proposed aim embodies the concept of “20-minute neighbourhoods” i.e., creating an environment where the community is happy to travel actively (e.g. by foot or cycle) for short distances from home to services and destinations they need to support their day to day lives; these include shopping, school, green spaces and more. Urban extensions including provision of on-site services, at existing less sustainable settlements, can reduce the number of trips currently made by car to services and facilities much further afield.

35. Section 6 of the draft District Plan sets out the Plan Strategy in further detail. The Plan Strategy will guide the distribution of allocations, which will be set out in the Scrutiny Committee report to be considered at the meeting on 18th October.

Policies

36. The proposed draft revised District Plan includes a revised suite of planning policies which will be used in the determination of planning applications. This includes policies that have had a major update as a result of review, and new policy areas that were not included in the adopted District Plan. For completeness, the draft District Plan also includes policies that do not require an update i.e. remain unchanged from the current policy in the adopted District Plan. The status of each policy is clearly indicated for ease.
37. The drafting of updated and new policies is supported by a proportionate, up-to-date and robust evidence base as required by national policy. The full evidence base that has supported the policies is available online at www.midsussex.gov.uk/DistrictPlan. It is important to note that the evidence base is organic and will be updated with any new additions between now and submission of the District Plan for examination.
38. The policies have been categorised under the following chapter headings:

Sustainability
Natural Environment and Green Infrastructure
Countryside
Built Environment
Transport
Economy
Sustainable Communities*
Housing*
Infrastructure

*Note: the Sustainable Communities section, and site allocations within the Housing section will be the subject of the Scrutiny Committee report for consideration at its meeting on 18th October.

Sustainability

39. This section includes a new policy outlining the Council's approach to addressing the causes of climate change (DPS1), for example, by setting out how development should reduce carbon emissions and mitigate future impacts. The rest of the policies within this section address these aims specifically, in particular a policy on Sustainable Design and Construction (DPS2) has been significantly updated to include the requirement to submit sustainability statements, the requirement to meet Home Quality Mark and BREAM standards and to achieve the tightest possible standards in relation to water consumption.
40. A new policy on Health and Wellbeing (DPS6) has been included to maximise opportunities to enable healthy lifestyles.

Natural Environment and Green Infrastructure

41. The Environment Act (2021) became law in November 2021. A new draft policy (DPN2) is included that requires a minimum of 10% net gain in biodiversity, with higher levels on larger sites. This policy will continue to evolve as guidance and best practice emerges between now and the Plan's adoption.
42. A new policy is included on Green Infrastructure (DPN3) recognising that this delivers a range of environmental, social and economic benefits including resilience to climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Countryside

43. This section contains minor updates to existing policies that seek to protect and enhance the countryside (including protected landscapes such as the High Weald AONB and South Downs National Park), prevent coalescence, and the Council's policy related to impacts on Ashdown Forest, a European protected site within Wealden district.

Built Environment

44. This section contains minor updates to existing policies related to design (DPB1) and protection of heritage such as listed buildings (DPB2) and conservation areas (DPB3).

Transport

45. Major updates have been made to policies in this section to reflect the adoption of West Sussex County Council's Transport Plan 2022-2036 in April 2022. This section updates existing transport policies to encourage placemaking, connectivity and active travel (such as cycling and walking), but also adds additional new policies related to Parking and Electric Vehicle Charging Infrastructure (DPT4) and to restrict Off-Airport Car Parking (DPT5).

Economy

46. Crawley, Horsham and Mid Sussex make up a local Functional Economic Market Area (FEMA). An Economic Growth Assessment (EGA) was commissioned for the FEMA and was published in 2020. A Mid Sussex EGA update has been prepared to consider changing economic circumstances since, in particular the Covid-19 pandemic and forecast impact on job growth and land requirements.
47. The EGA update confirms that, based on predicted future housing growth, economic forecasting and current supply of employment sites permitted and allocated, there is a surplus of employment land up to 2038. The EGA update therefore concludes that no further employment allocations are required at this stage however facilitative policies are included within this section to allow for growth.
48. Since the District Plan was adopted in 2018, much has changed in relation to retail. An updated Retail Study (2022) has assessed future needs for retail as well as policy recommendations to respond to national policy on town centre uses and changes to the Use Class Order in 2020 (related specifically to Class E). Whilst the study concludes that there is no requirement for additional allocation of retail land, it has proposed revisions to existing policy requirements for designated town centre boundaries and Primary Shopping Areas which are set out in policies DPE4 and DPE5.

Housing

49. Site allocations will be the subject of a future Scrutiny Committee, scheduled for October 18th.
50. This section also contains updated policies in relation to Older Persons Accommodation (DPH26), Self and Custom Build Housing (DPH30) and First Homes (DPH33) to accord with the findings of the Strategic Housing Market Assessment (SHMA) which forms part of the evidence base. These policies seek to address the need for these types of homes. Amendments have also been made to the Housing Mix policy (DPH31) to reflect the Strategic Housing Market Assessment (the SHMA) and comments made during the Members Working Group in relation to types of accommodation.

Infrastructure

51. This section updates the existing District Plan policy related to securing infrastructure, but also contains new policies related to Planning Obligations (DPI2) and Major Infrastructure Projects (DPI3).
52. Subject to Council approval, these policies will be subject to public consultation. They will not carry full weight until they have been through the whole plan making process and are adopted by the Council following successful examination by an independent Inspector.

Members Working Group

53. The Working Group reviewed the major updates to policies. Note that, whilst 10 existing policies required a major update, for clarity and ease of reading, some existing policies had been split into multiple policies in the revised District Plan. For example, current policy DP2: Town Centre Development had been split into three policies DPE4, DPE5 and DPE6. The Working Group reviewed the following:

- **DPE1:** Sustainable Economic Development

- **DPE4:** Town and Village Centre Development
- **DPE5:** Within Town and Village Centre Boundaries
- **DPE6:** Development within Primary Shopping Areas
- **DPE7:** Smaller Village and Neighbourhood Centres
- **DPH2:** Sustainable Development - Outside the Built-up Area
- **DPH3:** Sustainable Development – Inside the Built-Up Area
- **DPI1:** Securing Infrastructure
- **DPI2:** Planning Obligations
- **DPT1:** Placemaking and Connectivity
- **DPH35:** Housing Mix
- **DPH34:** Self and Custom Build Housing
- **DPH33:** Gypsies, Travellers and Travelling Showpeople
- **DPN1:** Biodiversity, Geodiversity and Nature Recovery
- **DPN3:** Green Infrastructure
- **DPS2:** Sustainable Design and Construction

54. The Working Group also reviewed the following new policies that are not contained in the existing District Plan:

- **DPS1:** Climate Change
- **DPS6:** Health and Wellbeing
- **DPN2:** Biodiversity Net Gain
- **DPT3:** Active Travel
- **DPT4:** Parking and Electric Vehicle Charging Infrastructure
- **DPI3:** Major Infrastructure Projects

55. The Member Working Group reviewed all the draft policy wording and all the points raised (over 50 in total). Where changes to policies and supporting text was agreed as a result of the Working Group’s input, these are reflected in the draft District Plan appended to this report at Appendix 2. All changes to policies since the original draft publication in January 2022 are shown as “track changes” and are summarised below.

56. After reviewing the policies requiring Major Update and New Policies the Members Working Group confirmed that their review was complete.

Next Steps

57. At its meeting on the 18th of October this Scrutiny Committee will consider the full draft revised District Plan (including the proposed site allocations), and the full suite of legally required documents. Subject to Scrutiny Committee on 18th October, the Council at its meeting on the 2nd of November will be recommended to approve the Plan and the full suite of legally required documents for purposes of public consultation.

58. Subject to the decision of Council the draft revised District Plan will then progress to Regulation 18 consultation for a minimum 6-week period, in accordance with all legal and national policy requirements.

Policy Context

59. The review (and subsequent update) of the District Plan is a corporate priority identified in the Corporate Plan and Budget 2022/23 (March 2022) and Service Plan for Planning and Economy. It aligns with the Council’s priorities for Sustainable Economic Growth and Strong and Resilient Communities.

Other Options Considered

60. There is a legal and national policy requirement to review the Plan and update where necessary. There is also a Council commitment within its currently adopted District Plan to do so. The Council could decide not to review or update the Plan, however this would have significant impacts on its ability to apply full weight to its existing policies when determining planning applications.

Financial Implications

61. Preparation of the District Plan review and update is funded by a specific reserve, as agreed in the Corporate Plan and Budget 2022/23 (March 2022). This reserve has funded evidence base studies to support the work and will continue to be required to fund future evidence, legal advice and examination costs. The work carried out so far is within the identified budget.

Risk Management Implications

62. There is a legal and national policy requirement to review and update local plans to ensure that they continue to be effective and carry full weight when making planning decisions. Without an updated plan, there is a risk that some policies would be deemed out-of-date and the weight afforded to them when determining planning applications reduced. Paragraphs 10 – 12 set out the implications on the 5-year housing land supply, including the threat of speculative development and associated costs in defending unwanted developments.
63. The Government introduced a Levelling Up and Regeneration Bill to Parliament in May 2022. This proposes changes to the planning system, however as the Bill has not yet received Royal Assent it is difficult to predict the impacts that any future changes and/or transition periods will have on the progress of the District Plan. The Government has urged local authorities to continue plan-making, and at this moment in time Local Planning Authorities must continue to comply with current legislation, which requires Local Plans to be updated where required every 5 years. The same punishments for not complying, including the consequences of not meeting housing need or maintaining a 5-year housing land supply are still in force. This position will be kept under review as the work on the preparation of the District Plan progresses.

Equality and Customer Service Implications

64. An Equality Impact Assessment will be prepared to ensure opportunities to promote equality and/or barriers to service are considered and addressed. A copy will be provided as part of the papers to be considered by Scrutiny Committee at its meeting on 18 October.

Other Material Implications

65. There are no other material implications.

Sustainability Implications

66. The updated District Plan includes a range of sustainability policies as described above. The National Planning Policy Framework recognises the role that planning can have in addressing and mitigating future impacts of climate change – the draft policies within the updated District Plan reflect national policy and ambitions.

67. It is a legal requirement for the District Plan to be accompanied by a Sustainability Appraisal (incorporating Strategic Environmental Assessment) at each formal stage of the plan-making process which documents the impacts of proposed policies, strategy and sites against the sustainability criteria and informs the plan-making process by ensuring the plan is the most sustainable given all reasonable alternatives. A copy will be appended to the next Scrutiny Committee report alongside the full draft District Plan.

Appendices

Appendix 1: District Plan Review – Scope

Appendix 2: Draft District Plan – Strategy and Non-Housing Site Policies

Background Papers

The full evidence base to support the Policies is available online at www.midsussex.gov.uk/DistrictPlan (following links to the District Plan Review page).

Note: the full Evidence Base to support the Plan as a whole will be available at the time of the publication of the papers for the next Scrutiny Committee meeting where the complete draft revised District Plan, including the sites, will be scrutinised.

DP Review – Review of Scope and Updates Required

APPENDIX 1

Adopted District Plan Policies

Review Status

- **No Update Required:** Policy as written in the District Plan does not require any amendment – remains ‘in date’ with full weight.
- **Minor Update:** 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 or requirements 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.

Policy	Review Status	Reason
DP1: Sustainable Economic Development	Major Update	<ul style="list-style-type: none"> • Update Employment Need figures and economic forecasting, further allocations if required • To reflect the additional requirements set out in the revised NPPF (July 2021)
DP2: Town Centre Development	Major Update	<ul style="list-style-type: none"> • To update Shopping Frontage and any re-definition of town centre boundaries • To reflect evidence base updates, particularly retail needs • To reflect amendments set out in the revised NPPF (July 2021) • To reflect Covid-19 impacts and potential options to facilitate recovery
DP3: Village and Neighbourhood Centre Development	Major Update	<ul style="list-style-type: none"> • To reflect any amendments to be made to the Retail settlement hierarchy • To review change of use restrictions given Covid-19 impacts and to facilitate recovery • To review whether neighbourhood centres should be a requirement for new developments over a certain threshold
DP4: Housing	Major Update	<ul style="list-style-type: none"> • To account for revised Housing Requirement in light of Standard Method and unmet need • To establish the latest position in terms of current supply (completions/commitments) • To set out a strategy/sites to meet the housing need
DP5: Planning to Meet Future Housing Need	N/A	<ul style="list-style-type: none"> • The objectives of this policy are to be addressed through the preparation of the District Plan Review and set out as part of the Plan Strategy
DP6: Settlement Hierarchy	Major Update	<ul style="list-style-type: none"> • To review appropriateness of the ‘contiguous’ policy and to clarify the wording in relation to built-up areas • To review the Settlement Hierarchy and approach to distributing need in accordance with a potentially revised strategy

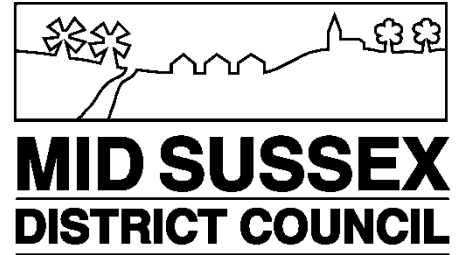
DP7 – DP11: Site Allocations	N/A	To be saved (i.e. will remain as ‘Commitments’ until development complete)
DP12: Protection and Enhancement of Countryside	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP13: Preventing Coalescence	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP14: Sustainable Rural Development and the Rural Economy	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) To reflect Covid-19 impacts and facilitate recovery
DP15: New Homes in the Countryside	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) Minor updates to references / for clarity
DP16: High Weald Area of Outstanding Natural Beauty	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP17: Ashdown Forest SPA and SAC	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy currently. Review may be required should the SANG/SAMM strategy require amendment – monitor.
DP18: Setting of the South Downs National Park	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP19: Sustainable Tourism	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP20: Securing Infrastructure	Major Update	<ul style="list-style-type: none"> To remove reference to pooling restrictions Update will be required should national policy or legislation introduce additional mechanisms for collecting developer contributions (e.g. National Infrastructure Levy)
DP21: Transport	Major Update	<ul style="list-style-type: none"> To reflect updated West Sussex Transport Plan To reflect the additional requirements set out in the revised NPPF (July 2021) To assess potential for additional parking/EV standards
DP22: Rights of Way and Other Recreational Routes	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP23: Communication Infrastructure	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity

DP24: Leisure and Cultural Facilities and Activities	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP25: Community Facilities and Local Services	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP26: Character and Design	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Add reference to Design Guide
DP27: Dwelling Space Standards	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP28: Accessibility	Minor Update	<ul style="list-style-type: none"> To reflect updated evidence within the SHMA The aims and objectives of this policy remain in date and consistent with national policy and current building regulations
DP29: Noise, Air and Light Pollution	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. An update to the 'air' element was included in the Sites DPD
DP30: Housing Mix	Major Update	<ul style="list-style-type: none"> Review of housing mix and whether the policy should be more specific C2 Need – to be addressed in this policy or standalone G&T Need – to be reviewed alongside DP33
DP31: Affordable Housing	Minor Update	<ul style="list-style-type: none"> Affordable housing need to be assessed in a revised SHMA, policy to be updated to reflect this evidence.
DP32: Rural Exception Sites	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP33: Gypsies, Travellers and Travelling Showpeople	Major Update	<ul style="list-style-type: none"> An update will be required to account for updated G&T needs evidence
DP34: Listed Buildings and Other Heritage Assets	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP35: Conservation Areas	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP36: Historic Parks and Gardens	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.

DP37: Trees, Woodland and Hedgerows	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP38: Biodiversity	Major Update	<ul style="list-style-type: none"> To account for forthcoming Government guidance on Biodiversity Net Gain
DP39: Sustainable Design and Construction	Major Update	<ul style="list-style-type: none"> To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) To reflect the additional requirements set out in the revised NPPF (July 2021)
DP40: Renewable Energy Schemes	Minor Update	<ul style="list-style-type: none"> Policy provides sufficient support and therefore is in accordance with the revised NPPF (July 2021) Minor updates to references / for clarity
DP41: Flood Risk and Drainage	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP42: Water Infrastructure and the Water Environment	Minor Update	<ul style="list-style-type: none"> To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) To reflect the additional requirements set out in the revised NPPF (July 2021)

Major Update	11
Minor Update	18
No Update	7
Not replaced	1

Mid Sussex



APPENDIX 2

District Plan 2021 - 2039

Non-Housing Site Policies

(Draft – Regulation 18)

Scrutiny Committee for Planning, Economic Growth and
Net Zero

5th October 2022

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1. District Plan – Introduction

Mid Sussex District Plan - Overview

Mid Sussex District Council adopted the Mid Sussex District Plan 2014-2031 in March 2018. The adopted District Plan set the vision and strategy, with accompanying site allocations and policies to achieve the vision and strategy.

District Plan policy **DP4: Housing** committed the Council to reviewing the plan, starting in 2021, with submission to the Secretary of State in 2023. This accords with the 5-year review requirement set out in national policy.

This is the consultation draft (Regulation 18) Mid Sussex District Plan 2021 – 2039. It reflects the outcome of the review process described below. It contains an updated vision, strategy, site allocations and policies and will supersede the adopted District Plan upon its adoption which is anticipated in 2024.

District Plan Review and Update – Process

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

The National Planning Policy Framework (NPPF, July 2021) mirrors the legislation by requiring Local Planning Authorities to review Local Plans at least once every five years and update them as necessary (paragraph 33).

Upon the 5th anniversary of adoption (2023), the District Plan will not be out-of-date automatically, as policies age at different rates. The review process is a method to ensure that a plan and the policies within it remain effective. It is important to note that, whilst this District Plan contains updated policies – no decision has been made as to whether any policy is currently considered “out-of-date”.

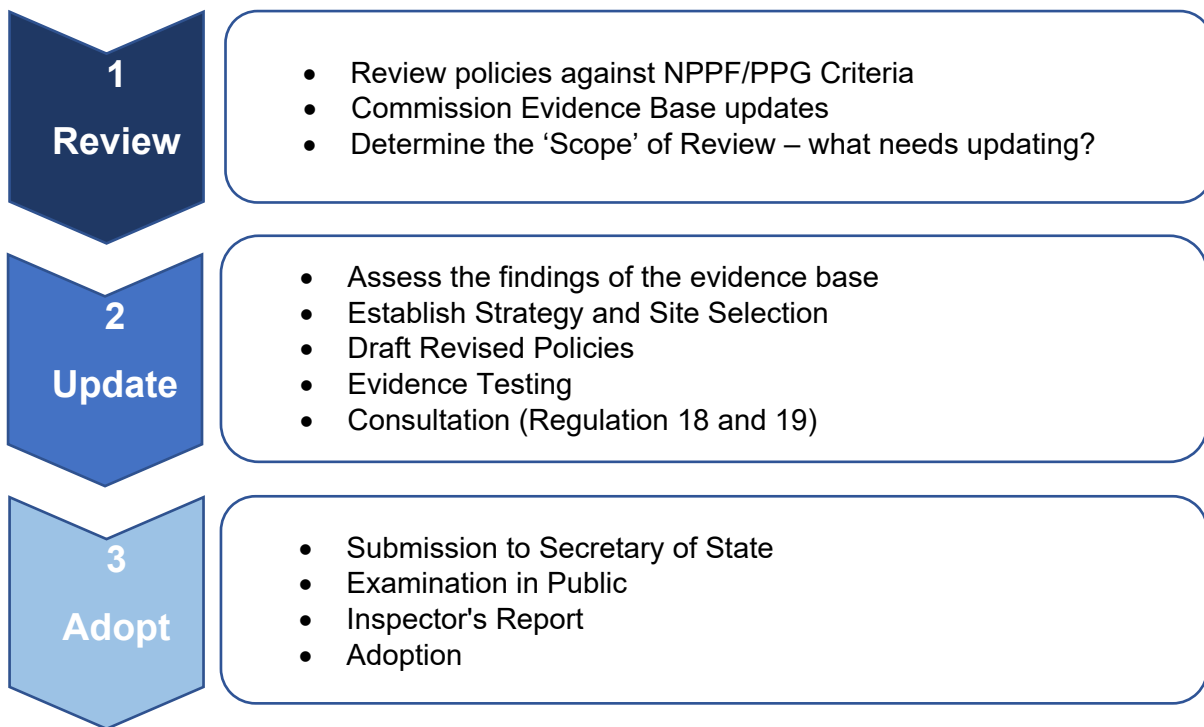
In reviewing plans, the NPPF states that the following needs to be considered:

- Any changing circumstances affecting the area
- Any relevant changes in national policy

It is a requirement to monitor the impact of policies to measure progress against need-based requirements and to assess the effectiveness of adopted policies. The review process also provides an opportunity to make amendments to policies as a result of this monitoring information.

It is also an opportunity to address other matters, such as issues that have arisen during the current plan period, the impact of other plans (such as within neighbouring authorities or regionally) and significant economic changes (such as impacts of Brexit and the Covid-19 pandemic).

There are three distinct phases in the preparation of this District Plan:



1. Review the existing District Plan

All current District Plan 2014-2031 policies have been reviewed for their conformity with the NPPF, changing local circumstances and other factors.

The process identifies that current policies fall within three categories, with conclusions subject to the findings of Regulation 18 consultation:

- **No Update Required:** Policy as written in the District Plan does not require any amendment
- **Minor Factual/Clarity:** Policy as written in the District Plan is still in date however factual corrections, updates (e.g., cross-references or references to changes in updated policy/SPDs/guidance) or points of clarification are required. Does not change the overall meaning or requirements of the existing policy.
- **Full Update:** Existing policy requires an update as a result of changing targets, strategy, updated evidence base, local circumstances or national policy.

In order to support this work, the District Plan evidence base was updated. This included commissioning of specialist studies to assess whether an update was required, and if so, to establish new requirements, described in Section 4.

2. Update – a new District Plan

This document reflects the outcome of the review process. It includes draft policies that, upon adoption, will supersede the existing adopted strategy and policies – thus updating them to ensure they continue to remain effective.

National Planning Policy requires plans to look ahead for a minimum of 15 years from adoption (anticipated 2023). The plan period therefore extends to 2039, 8 years beyond the existing District Plan.

For completeness, this District Plan also contains policies that were reviewed and found to be in-date (i.e. no updates, or only minor amendments were required) so that upon adoption the Council's Strategic policies can be read as a whole.

This document is the Consultation Draft (Regulation 18) District Plan and will be subject to stakeholder consultation in accordance with the regulations and the Council's adopted Statement of Community Involvement. This process will enable communities, statutory bodies, those working in the area and those with land interests to comment and inform the next version of the plan.

3. Adoption

Following the statutory consultation periods the District Plan will be submitted to the Secretary of State. An independent Planning Inspector will be appointed to examine the plan to ensure it meets all legal and soundness requirements (in accordance with national policy). Upon receipt of an Inspector's Report concluding the plan is sound, the Council can adopt the plan. Once adopted it will be part of the Council's Development Plan and will carry full weight when determining planning applications.

Mid Sussex Development Plan

Upon adoption of the District Plan 2021 – 2039, the Development Plan for Mid Sussex will contain the following:

- Mid Sussex District Plan 2021 – 2039
- Site Allocations Development Plan Document (2022) (note that three policies are replaced by policies in this plan)
- Saved policies in the Small Scale Site Allocations Development Plan Document (2008)
- Saved policies in the Mid Sussex District Plan 2014 – 2031 and Local Plan 2004¹
- Supplementary Planning Documents – full list available at www.midsussex.gov.uk/SPDS
- Made Neighbourhood Plans – full list available at www.midsussex.gov.uk/NeighbourhoodPlans

¹ Saved policies are listed in Chapter 17

2. Background

Mid Sussex Context

Mid Sussex is a rural district in the southeast of England, situated within the county of West Sussex.

The district contains three towns – Burgess Hill, East Grinstead and Haywards Heath which accounts for around two thirds of the population. It also contains a number of large villages, small villages and hamlets each with their own heritage, characteristics and aspirations for the future.

Mid Sussex is characterised by beautiful countryside. Nearly 50% of the district is within the High Weald Area of Outstanding Natural Beauty, and over 10% is within the South Downs National Park. The Mid Sussex District Plan covers the area outside the National Park; the South Downs National Park Authority are the local planning authority for that area and have adopted their own Local Plan (2019).

The Census 2021 estimated a population of around 152,000 people, 60% of which are aged 16-64. Following current demographic trends, this is projected to increase by over 7% by the end of the plan period. Mid Sussex has an ageing population, with numbers of those aged 65+ predicted to increase by 34% over the plan period. These reflect County-wide and regional trends.

Mid Sussex accommodates just over 68,000 workforce jobs, with 79% of 16 to 64 year olds economically active and low levels of unemployment (3% compared to 5% national).

Wider Context

Mid Sussex is bordered by the following authority areas:

- Crawley Borough
- Horsham District
- Adur District
- Brighton and Hove
- Lewes District
- Wealden District
- Tandridge District
- South Downs National Park

Mid Sussex is situated primarily within the Northern West Sussex Housing Market Area and Functional Economic Market Area. This is a long-established position which was tested at each of the authorities respective Local Plan examinations, supported by evidence. There are also overlaps with a secondary Housing Market Area (Coastal West Sussex) in the southern part of the district.

Northern West Sussex

The Northern West Sussex Housing Market Area (HMA) and Functional Economic Market Area (FEMA) consists of the following authority areas:

- **Mid Sussex**
- **Crawley**
- **Horsham**

This was confirmed by a jointly commissioned Strategic Housing Market Assessment (SHMA) in 2009, which was updated to support each of the authorities adopted Local Plans. Crawley and Horsham commissioned an update in November 2019, with a Mid Sussex updated prepared to support this District Plan in 2021. The updated SHMA confirmed that the evidence continues to support the definition of the Northern West Sussex HMA.

Sussex Coast

The south of the district (south of Burgess Hill) has overlaps with the Sussex Coast HMA and FEMA which consists of the following authority areas:

- **Mid Sussex**
- **Adur and Worthing**
- **Brighton and Hove**
- **Crawley**
- **Horsham**
- **Lewes**
- **South Downs National Park**

The majority of the district which overlaps with this HMA and FEMA is within the South Downs National Park and therefore not within the plan area covered by this District Plan – the South Downs National Park Authority are the planning authority for this area and have produced their own Local Plan.

West Sussex and Greater Brighton Strategic Planning Board

The West Sussex and Greater Brighton Strategic Planning Board authorities are:

- **Mid Sussex**
- **Adur**
- **Arun**
- **Brighton and Hove**
- **Chichester**
- **Crawley**
- **Horsham**
- **Lewes**
- **Worthing**
- **South Downs National Park**

The West Sussex & Greater Brighton (WS&GB) Strategic Planning Board was formed to identify and manage strategic planning issues within that area and to support better integration and alignment of strategic spatial and investment priorities. It was initially made up of the coastal West Sussex local planning authorities together with Brighton & Hove City Council and Lewes District Council but was expanded to include the authorities within the Northern West Sussex HMA (Mid Sussex, Crawley and Horsham).

The Board, which comprises lead Councillors from each of the LPAs works in an advisory capacity with all decision-making through the individual member authorities.

Its remit is to:

- identify and manage spatial planning issues that impact on more than one local planning area within WS&GB; and
- support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

A Local Strategic Statement (LSS), which set out long term Strategic Objectives and Spatial Priorities for delivering these, was endorsed by each of the then constituent authorities in 2013. In 2015 the LSS was updated through a focused 'refresh'

At its meeting in September 2017, the Board agreed to explore options for meeting the unmet housing needs across the Board area, to commit to preparation of an updated strategy and to commission work to provide an evidence base to support the development of a longer-term strategy to address spatial options for meeting housing, employment and infrastructure needs over the period to 2050 - known as LSS3. Mid Sussex plays an active role in the ongoing work to progress LSS3.

3. Achieving Sustainable Development

The National Planning Policy Framework (NPPF, July 2021) is clear that the purpose of the planning system is to contribute to the achievement of sustainable development, which is broadly defined as:

“Meeting the needs of the present without compromising the ability of future generations to meet their own needs”

The NPPF sets three over-arching objectives to be delivered through the preparation of plans and policies, such as the District Plan:

- **Environmental:** to protect and enhance our natural, built and historic environment
- **Economic:** to build a strong, responsive and competitive economy
- **Social:** to support strong, vibrant and healthy communities

Members of the United Nations – including the United Kingdom – have also agreed 17 inter-connected goals to achieve a better and more sustainable future for all, which align with the three over-arching objectives. These “Sustainable Development Goals”, identified below, form part of the UN 2030 Agenda for Sustainable Development.



The NPPF encourages Local Plans to reflect the 17 Sustainable Development Goals. The District Plan therefore embeds these goals and sets out policies within the plan to contribute to one or more of them.

Environmental Characteristics and Challenges

The Sustainability Appraisal identifies the following Environmental Characteristics and Challenges for Mid Sussex:

- Potential for development to have an impact on Air Quality within the district (Air Quality Management Area) and outside (Ashdown Forest SAC).
- 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.
- There is a high pressure to deliver growth in the district and biodiversity net gain will need to be sought.
- Large areas of the district are protected for species and habitat value which come under pressure from development and activity.
- The impact of Climate change on increasing the risk of flooding.
- The impact of carbon emissions from numerous sources.
- 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.
- The impact of development and other growth on waste generated, including wastewater.
- Managing water resources and water quality is key to serve existing and future residents.

The Sustainable Development goals related to the environmental challenges are as follows:



Policies within this District Plan to address environmental challenges are as follows:

Sustainability	DPS1: Climate Change DPS2: Sustainable Design and Construction DPS3: Renewable and Low Carbon Energy Schemes DPS4: Flood Risk and Drainage DPS5: Water Infrastructure and the Water Environment DPS6: Health and Wellbeing
Natural Environment and Green Infrastructure	DPN1: Biodiversity, Geodiversity and Nature Recovery DPN2: Biodiversity Net Gain DPN3: Green 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
Countryside	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
Built Environment	DPB1: Character and Design DPB2: Listed Buildings and Other Heritage Assets DPB3: Conservation Areas

Economic Characteristics and Challenges

The Sustainability Appraisal identifies the following Economic Characteristics and Challenges for Mid Sussex:

- There is a high level of out commuting for work in Mid Sussex which puts pressure on the transport network.
- There is a variety of employment need across the district which can be challenging to accommodate locally.
- There is a significant difference in average wages between those working in the district and those working outside (potentially leading to out-commuting).
- There has been a change in shopping consumer patterns which has been exacerbated by the covid-19 pandemic.
- Whilst there is good public transport coverage generally, outside urban areas this can be infrequent and many residents are reliant on the private car.
- Impacts of future development on the highways network, which is already constrained and in need of further investment to increase capacity.

The Sustainable Development goals related to the economic challenges are as follows:



Policies within this District Plan to address economic challenges are as follows:

Transport	DPT1: Placemaking and Connectivity DPT2: Rights of Way and Other Recreational Routes DPT3: Cycling DPT4: Parking and Electric Vehicle Charging Infrastructure DPT5: Off-Airport Parking
Economy	DPE1: Sustainable Economic Development DPE2: Existing Employment Sites DPE3: Employment Allocations DPE4: Town and Village Centre Development DPE5: Within Town and Village Centre Boundaries DPE6: Development Within Primary Shopping Areas DPE7: Sustainable Rural Development and the Rural Economy DPE8: Sustainable Tourism and the Visitor Economy

Social Characteristics and Challenges

The Sustainability Appraisal identifies the following Social Characteristics and Challenges for Mid Sussex:

- Mid Sussex has an increasing, ageing and changing population.
- 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.
- 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.
- 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.
- Ease of access to health facilities is unequal across the district, with limited provision within the rural areas of the district.
- The delivery of new homes to address housing need in Mid Sussex will result in pressure on the education facilities capacity.
- Ease of access to education facilities is unequal across the district, with reduced provision within the rural areas of the district.
- Although crime levels are low within the district, opportunities for crime need to be further reduced.
- The attractiveness of the area directly impacts on house prices which are high in Mid Sussex, leading to affordability issues.
- The housing stock in Mid Sussex is largely dominated by larger detached or semi-detached properties which are owner occupied.
- 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.
- An increasing number of households.
- Although affordable homes are consistently being delivered in the District, the need for affordable homes is not met by existing or planned supply.
- There is a need for affordable housing in Mid Sussex where house prices are high compared to incomes.

The Sustainable Development goals related to the social challenges are as follows



Policies within this District Plan to address social challenges are as follows:

Sustainable Communities	DPSC Significant Site Allocations
Housing	DPH1: Housing DPH2: Sustainable Development - Outside BUA DPH3: Sustainable Development - Inside BUA DPH4: General Development Principles for Housing Allocations DPH: Housing Site Allocations DPH26: Older Persons Housing and Specialist Accommodation

	<p>DPH27 – DPH28: Older Persons Housing and Specialist Accommodation - Allocations</p> <p>DPH29: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH30: Self and Custom Build Housing</p> <p>DPH31: Housing Mix</p> <p>DPH32: Affordable Housing</p> <p>DPH33: First Homes</p> <p>DPH34: Rural Exception Sites</p> <p>DPH35: Dwelling Space Standards</p> <p>DPH36: Accessibility</p>
Infrastructure	<p>DPI1: Securing Infrastructure</p> <p>DPI2: Planning Obligations</p> <p>DPI3: Major Infrastructure Projects</p> <p>DPI4: Communications Infrastructure</p> <p>DPI5: Open Space, Sport and Recreational Facilities</p> <p>DPI6: Community and Cultural Facilities and Local Services</p>

20 Minute Neighbourhoods

In order to achieve sustainable development and promote sustainable communities in accordance with the NPPF and Sustainable Development Goals, this Plan aligns with the concept of 20-minute Neighbourhoods.

What is a 20-minute neighbourhood?

The Town and County Planning Association (TCPA) has produced a 'Guide to 20-minute Neighbourhoods' (March 2021) which provides guidance and information on the features which make up a 20-minute neighbourhood and how to successfully implement in existing places and when planning new large-scale developments.

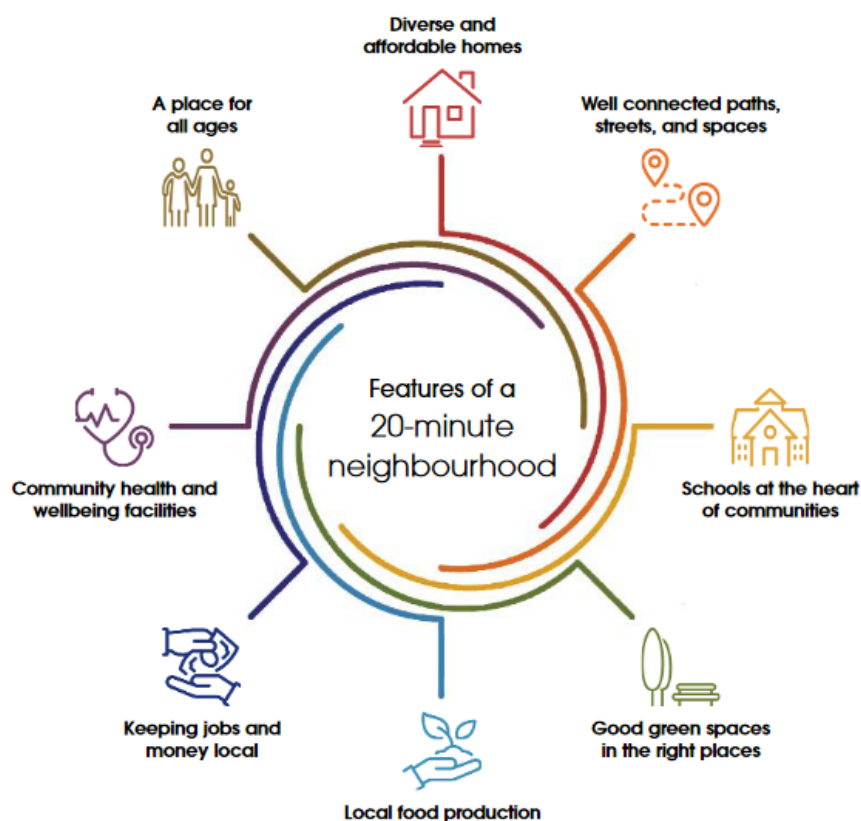
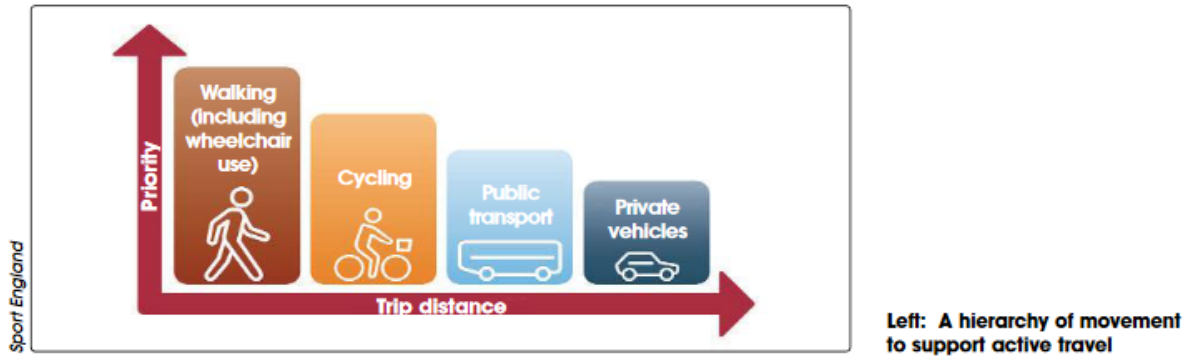


Figure 1 - Diagram produced in The Town and County Planning Association 'Guide to 20-minute Neighbourhoods - Creating Healthier, Active, Prosperous Communities' (March 2021).

The concept is not new and has been implemented in diverse places across the world and provides the framework to support a holistic and transformational approach to place-making, with significant potential to improve people's health and wellbeing. Research has shown that 20 minutes is the maximum time that people are willing to walk to meet their daily needs.

The 20-minute neighbourhood is about creating attractive, interesting, safe, inclusive, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to services and destinations they need to support their day to day lives; these include shopping, school, green spaces and more. One of the core principles is to ensure places are accessible by everyone on foot, wheeling, by cycle, by public transport and without having to use a car.



What are the benefits?

The environments in which we live, work and play have profound impacts on our health and wellbeing. How well we plan, design and create new places and regenerate existing ones will help or hinder work to tackle a wide range of issues, including health inequalities, climate change, and the decline in local high streets and economies. In order to help people and places to thrive and to tackle these issues we need to transform the way that we live. We need to create environments that make it easier for everyone to be more physically active, and our District Plan has a key role to play in achievement of this aspiration.

As identified above there are a number of challenges facing the district with the need to:

- reduce carbon emissions and reduced air pollution
- help people become more active, improve physical and mental health and reduce loneliness
- improve prosperity of local high streets
- improve access to affordable healthy food
- improve our towns and villages to make them great places to live.

The 20-minute neighbourhood concept is one mechanism we can use to start to address these interconnected issues simultaneously. The District Plan will seek to ensure we plan, design, regenerate and create inclusive communities that meet people's everyday needs, help to tackle health inequalities, and enable everyone to thrive through the creation of complete, compact and connected neighbourhoods in which people can meet the majority of their daily needs within a short walk or cycle ride, and in which local economies are strengthened and opportunities to reduce food miles are taken.

The benefits that this way of configuring places brings are multiple and include healthier communities, cleaner air, stronger local economies, and better resilience against climate change.

How could it work in rural areas?

In rural areas, the implementation of 20-minute neighbourhoods will pose a different set of challenges from those typical in urban areas. One of the key aims is to support the increased trend for living locally seen during the Covid-19 pandemic and to improve digital connectivity, particularly where existing infrastructure is poor quality with slow speeds, and wherever possible building on the Local Full Fibre Network (LFFN), which is already being rolled out in the district.

The TCPA 20-minute neighbourhood guide sets out the potential of two approaches to rural settlements, the application of which will depend on the location and, in some cases, a combination of the two approaches may be appropriate.

The first, is to ensure that each of the three main towns of Burgess Hill, Haywards Heath and East Grinstead become complete and compact 20-minute neighbourhoods. Although people from nearby villages would need to travel to the town to use its services, once there they would be able to walk within the town and find most of what they need for their everyday lives, rather than having to travel to several different places.

The second approach, more suited to more rural areas of the district which are characterised by smaller villages and more remote from the three towns, is to encourage creation of a network of villages that collectively provide what most people need for their daily lives, joined by active travel and public transport arrangements. There is also the opportunity to promote growth at such settlements that would provide new facilities, such as education and health, for both new and existing residents to benefit from.

There is clear synergy with this approach and the 20-minute neighbourhood principles more generally embedded in the Vision and Objectives of West Sussex County Council's Local Transport Plan (LTP) 2022-2036 which seeks to support a 'healthy West Sussex' and enable rural communities to 'live locally by accessing local services or nearby towns'. The LTP sets out a number of measures designed to support this objective including reducing the need to travel by car referred to as 'local living', delivering an active travel strategy and development of a coherent network of active travel facilities which is inclusive for all users, supporting delivery of Local Cycling Walking and Infrastructure Plan (LCWIP) and making active travel modes and shared transport services more attractive options.

4. District Plan – Supporting Evidence

Evidence Base

Plans must be underpinned by relevant and up to date evidence, which is proportionate, focused tightly on supporting and justifying the policies concerned. To support the updated District Plan, the following evidence base studies were commissioned.

- **Strategic Housing Market Assessment (SHMA)** – to establish the district’s housing need, including affordable housing and older persons’ accommodation and inform the need for potential site allocations
- **Gypsy and Traveller Accommodation Assessment (GTAA)** – to establish the district’s need for Gypsy and Traveller pitches and inform the need for potential site allocations
- **Economic Growth Assessment (EGA)** – to establish needs for office, industrial and storage and distribution uses and inform the need for potential site allocations
- **Retail and Town Centre Study** – to establish requirements for retail, leisure and town centre uses and to inform the need for potential site allocations
- **Urban Capacity Study** – to assess the potential supply of housing from brownfield sites within the district’s main urban areas
- **Transport Study** – to assess potential site allocations for their impact on the transport network
- **Air Quality** – to assess the impacts of additional traffic movements on Ashdown Forest SAC/SPA and Stonepound Crossroads AQMA
- **Water Cycle Study** – to assess the potential issues relating to future development and the impacts on water supply, wastewater collection and treatment and water quality.
- **Viability Assessment** – to assess the implications of the Plan on viability of development, to confirm the Plan is deliverable in viability terms.
- **Infrastructure Delivery Plan (IDP)** – an Infrastructure Delivery Plan is required to support the plan and set out the infrastructure requirements required to mitigate development impacts.
- **Sustainability Appraisal (SA)** – a legal requirement, to appraise options for strategy, policies and sites against sustainability criteria and assess impacts on social, environmental and economic objectives
- **Habitats Regulations Assessment (HRA)** – a legal requirement to test whether a plan could significantly harm the designated features of a European site; for the District Plan this relates to Ashdown Forest SAC/SPA.

These additions to the evidence base complement the existing substantial evidence base that supported the adopted District Plan. The Evidence Base is available to view on the District Plan web page (www.midsussex.gov.uk/DistrictPlan) and will be kept up-to-date as the District Plan proceeds to adoption.

Site Selection

The selection of sites within this District Plan has been informed by a detailed and robust site selection process. The starting point is the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA). This forms a pool of sites to assess for their development potential from the following sources:

A Site Selection methodology was established which was applied to the sites within the SHELAA. The purpose of this process was to reject sites that were not suitable for

development and to identify the most deliverable and developable for allocation within this plan. The process involved assessing sites against 14 assessment criteria which encompassed environmental, delivery and sustainability factors.

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will refer to the Site Selection: Conclusions Paper]

Sustainability Appraisal (SA)

The District Plan is accompanied by a Sustainability Appraisal (SA), which incorporates Strategic Environmental Assessment (SEA). It is a legal requirement for SA/SEA to be carried out when producing Local Plans. This District Plan is accompanied by Sustainability Appraisal which has been prepared in accordance with relevant legislation, national policy and guidance, and best practice.

The role of the SA is to promote sustainable development, by assessing the extent to which the plan will help achieve environmental, economic and social objectives given all reasonable alternatives. The SA documents appraisals of policy, strategy and site options against a range of sustainability criteria and identifies mitigation where any negative impacts can be expected. This ensures that the plan overall contributes towards sustainable development.

The Sustainability Appraisal is an iterative process, prepared and updated at each stage of the plan making process as additional options or mitigation are identified.

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will refer to the Sustainability Appraisal]

Habitats Regulations Assessment (HRA)

The District Plan is accompanied by a Habitats Regulations Assessment (HRA) which has been prepared in accordance with relevant legislation, guidance and best practice. The objective of the HRA is to identify if any aspects of the District Plan will have a likely significant effect, or where relevant, an adverse effect on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

The main potential impacts arising from the District Plan are recreational pressure and air quality. These are considered in detail in the HRA and Policy DPC6 sets out the strategic solution to recreational pressure and the approach to mitigation.

The HRA is an iterative process, prepared and updated at each stage of the plan making process.

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will refer to the Habitats Regulations Assessment]

Duty to Co-Operate

In accordance with legislation and national policy, the Council has a duty to co-operate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries.

Cross-boundary strategic issues are well established; these were identified during production of the adopted District Plan and during ongoing dialogue between authorities during production of respected Local Plans and Local Plan Reviews. The Council is aware of the respective housing and employment need positions of its neighbours through ongoing work, joint evidence base commissions and cross-boundary strategic working (such as

ongoing progress with the Local Strategic Statement ‘LSS3’ with the West Sussex and Greater Brighton authorities as described in Section 2).

Officers held a virtual briefing with neighbouring and nearby authorities on the purposes and review of the District Plan in September 2021. This session also contained a briefing on the District’s housing requirement and site selection process. The Site Selection Methodology was shared with all parties for comments; these have been reflected in the final version for publication.

Duty to co-operate meetings have been held with Crawley and Horsham at officer level to discuss the unmet need position within the Northern West Sussex Housing Market Area and to seek solutions. In addition, meetings have been ongoing with neighbouring authorities where there are likely to be cross-boundary impacts.

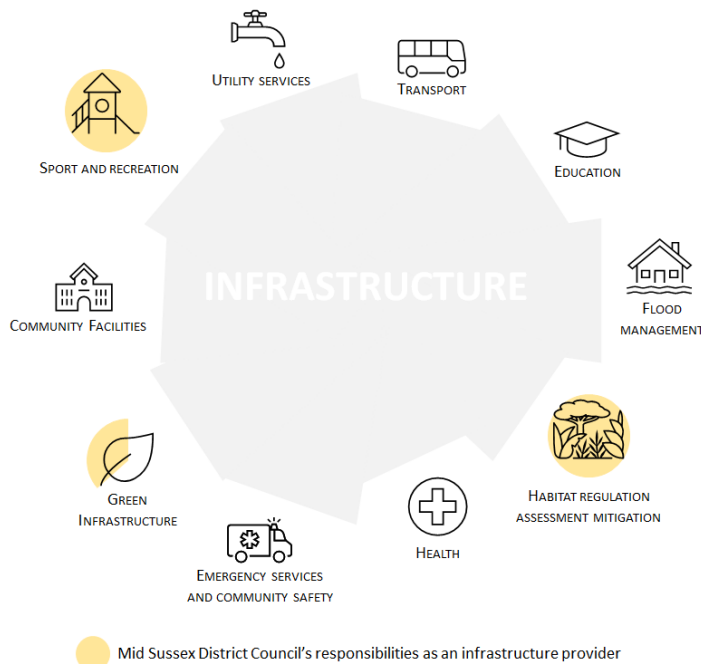
The duty to co-operate is an ongoing process and further co-operation will occur as the draft Plan progresses. In accordance with the NPPF, Statements of Common Ground will be prepared to capture cross-boundary matters and document progress in co-operating to address these, as the Draft Plan progresses towards Submission.

Infrastructure

As part of the local plan making process, the Council, as the local planning authority, has worked closely with key infrastructure providers and organisations to identify the level of infrastructure required to support planned development and to help ensure it will be accompanied by the necessary infrastructure, in the right place at the right time, to support sustainable communities and meet the plan’s Strategic Objectives. The Infrastructure Delivery Plan, Viability Study and liaison with site promoters form vital pieces of the Plan’s evidence base.

How is the level of required infrastructure determined?

It is vital the development which we are planning for in the District Plan is supported by the appropriate level of infrastructure and planning for the delivery of necessary infrastructure is key to achieving the Council’s updated Strategy and delivery of sustainable development.



The ultimate delivery of the full range of required infrastructure is not however fully within the council’s control and is instead dependent on partnership working between a variety of public, private and voluntary sector agencies. The Council has limited responsibilities in the delivery of most infrastructure, and as such is heavily reliant on external providers and organisations expertise and advice to determine what is needed to support development in the plan and to

ultimately deliver the required infrastructure.

The Council publishes an annual Infrastructure Funding Statement (IFS) online at <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/>. The IFS provides an overview of the development contributions (section 106 planning obligations) secured, received, allocated and spent during the report year.

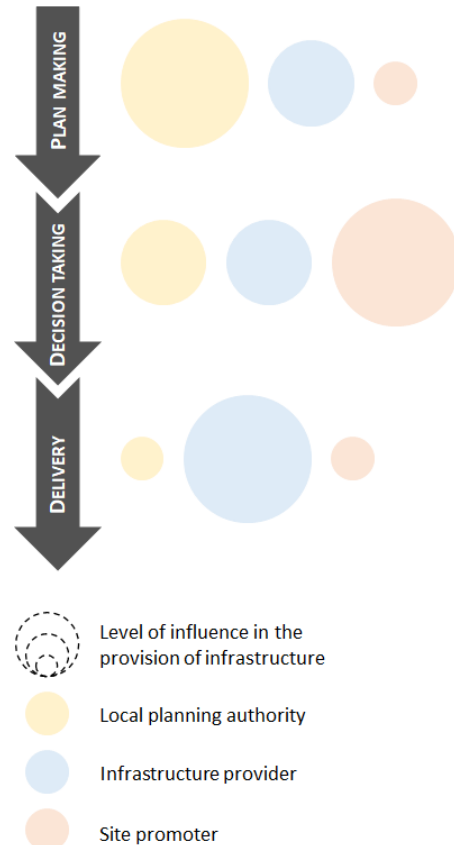
In 2020/21 the Council collected over £2.7m from planning obligations to be spent on infrastructure. The total amount of money spent in 2020/21 was £2.6m. The IFS sets out details of where this money is allocated and spent. Over the last three years, over 60% of funds secured through new development was directly collected and managed by other providers.

It is accepted that there is a wide range of infrastructure needs across the district, not all of these are required to support development through the District Plan 2021-2039. The preparation of the District Plan is intended to focus on the provision of new infrastructure to serve proposed future development and its role is not to remedy pre-existing deficiencies in infrastructure unless those deficiencies will be made more severe by new development (this is in accordance with legal and national policy requirements).

From an early stage of the plan-making process, the Council has engaged with infrastructure providers and site promoters. It has acted as a link to ensure that there is a joint understanding of the level of infrastructure required to be delivered for each new development, in particular for significant sites, as well as sufficient capacity and funding for timely delivery.

The Infrastructure Delivery Plan displays the outcomes of this collaborative approach and details the expected infrastructure to support development identified in the District Plan.

The Council is committed to securing and overseeing the delivery of the appropriate level of infrastructure to support future development across the district, but is aware of its changing role as development proposals progress through the planning system. At the application and delivery stage, the Council will be bounded by the provider's advice and will work proactively to secure and deliver the infrastructure.



5. Vision and Objectives

District Plan Vision

The Plan is based on the vision for the District set out in the adopted District Plan.

“A thriving, attractive and resilient District, which is a highly sustainable and desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

The vision is underpinned by three priority themes that promote the development of sustainable communities:

- **Environment:** Protecting and enhancing the natural, built, and historic environment;
- **Economy:** Promoting economic vitality; and
- **Social:** Ensuring cohesive, safe and healthy communities

Strategic Objectives

The three priority themes are supported by 15 strategic objectives which help guide the strategy and policies within this Plan. These strategic objectives remain unchanged from the adopted District Plan; they are still reflective of the Environmental, Economic and Social challenges facing the district and there have been no changing local circumstances or updated evidence to suggest that they need revising.

Environment

Protecting and enhancing the natural, built, and historic environment

1. To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change
2. To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence
3. To protect valued landscapes for their visual, historical and biodiversity qualities
4. To protect valued characteristics of the built environment for their historical and visual qualities
5. To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and

villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes

6. To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes as a priority the provision of efficient and sustainable transport networks

Economy
Protecting economic vitality

7. To promote a place which is attractive to a full range of businesses, and where local enterprise thrives
8. To provide opportunities for people to live and work within their communities, reducing the need for commuting
9. To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community
10. To support a strong and diverse rural economy in the villages and the countryside
11. To support and enhance the attractiveness of Mid Sussex as a visitor destination

Social
Ensuring cohesive, safe and healthy communities

12. To support sustainable communities which are safe, healthy and inclusive
13. To provide the amount and type of housing that meets the needs of all sectors of the community
14. To create environments that are accessible to all members of the community
15. To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations

6. District Plan Strategy

Current District Plan Strategy

The adopted District Plan Spatial Strategy focuses development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encourages proportionate growth at other settlements to meet local needs and support the provision of local services. This spatial strategy informed the location of allocations within the District Plan and subsequent Site Allocations DPD.

The plan periods for the adopted District Plan and this updated District Plan overlap. Development already planned for ('commitments' i.e. sites with planning permission or allocations with the Sites DPD or Neighbourhood Plans) is consistent with the existing District Plan strategy.

This updated District Plan extends the plan period to 2039, an additional eight years. It must account for changing evidence and circumstances, including an increased housing requirement. As part of the review process, it has been necessary to revisit the adopted spatial strategy to assess whether it can still be applied when assessing options for increased growth to meet needs over a longer period.

The District Plan review process has therefore sought to determine a) whether the existing strategy is still relevant given any changes to evidence or local circumstances; and b) whether the current strategy can be maintained given the extended plan period; future predicted needs; and availability of sites.

Areas with Potential for Further Growth

Given the environmental and infrastructure constraints within some areas of the district, existing committed development, and location of deliverable/sustainable sites with potential for allocation within the Strategic Housing and Employment Land Availability Assessment (SHELAA), some areas within the district have higher potential for further growth than others.

The findings of the evidence base has indicated that, beyond existing commitments:

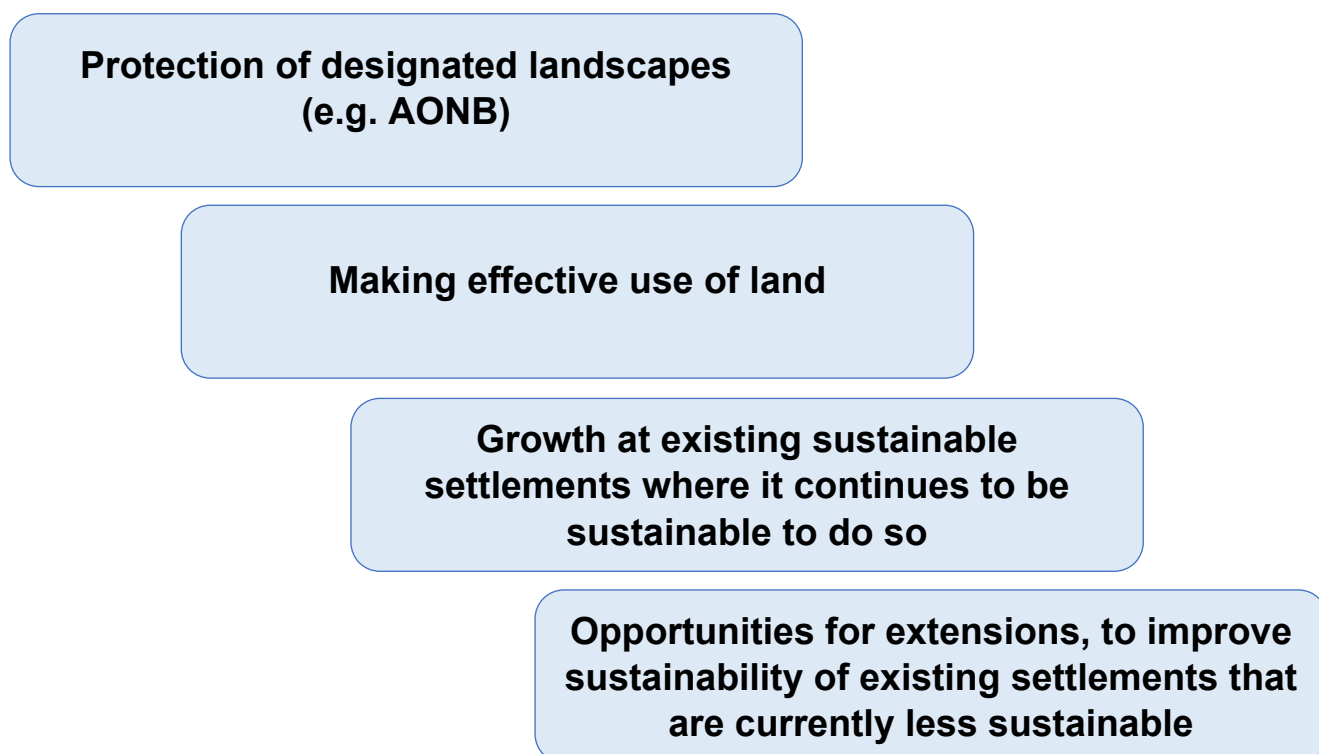
- There is limited further growth potential at East Grinstead and Haywards Heath and AONB settlements
- There is the potential for growth at some settlements not within the AONB and the extent of growth is dependent upon the characteristics of the settlements and the availability/size of sites which can make the settlements more sustainable (i.e. by providing much needed infrastructure such as primary schools and enhancing/creating village centres which offer much needed access to shops and services)

Potential for Growth at Settlements

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will include details of Potential for Growth at Settlements]

Updated District Plan Strategy

Further growth identified within this draft District Plan will be in accordance with the draft revised District Plan Strategy, which is based on the following four key principles:



Protection of designated landscapes (e.g. AONB)

Strategic Objectives met
District Plan Policies

3 - To protect valued landscapes
11 - Support Mid Sussex as a Visitor Destination
DPC4: High Weald Area of Outstanding Natural Beauty

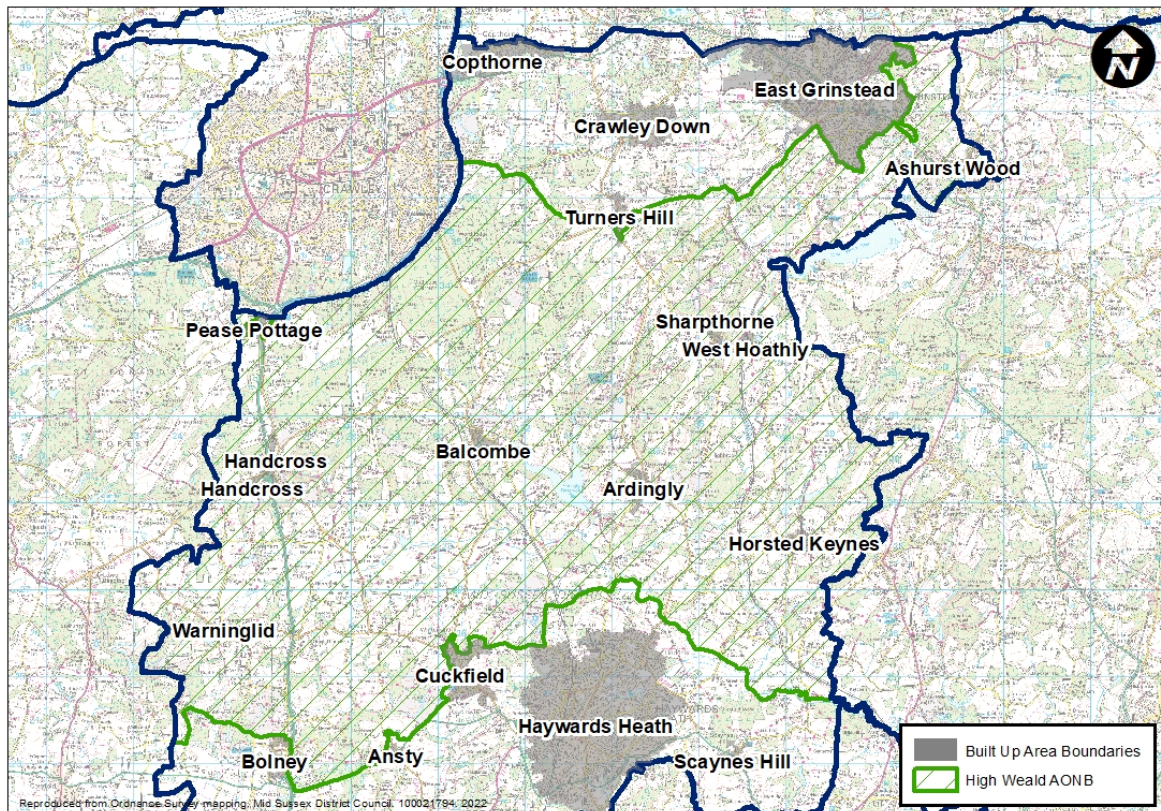
How?

A key principle for the District Plan Strategy and Strategic Objective of the Plan is the protection of designated landscapes and in Mid Sussex District this is the High Weald Area of Outstanding Natural Beauty. (Approximately 11% of Mid Sussex District is within the South Downs National Park, however, the District Plan does not include this area as the South Downs National Park Authority is the local planning authority for this area). Whilst protection of designated landscapes is important for the landscape itself, it also has benefits by being an attractive destination for visitors.

Why?

An Area of Outstanding Natural Beauty (AONB) is an area of land protected by the Countryside and Rights of Way Act 2000 for its outstanding natural beauty. The purpose of the landscape designation is to conserve and enhance the natural beauty of the area.

There are 34 AONBs in England covering 15% of the land. The High Weald AONB was designated in 1983. It has an area of 1,461 sq km and covers four counties and 11 districts. Nearly 50% of Mid Sussex District is within the High Weald AONB; there are 163.6 sq km of AONB land within Mid Sussex District which is approximately 11% of the High Weald AONB.



The High Weald AONB is a historic landscape characterised by a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams and woodlands. Small irregularly-shaped and productive fields typically used for livestock grazing are often bounded by hedgerows and woodland. Dispersed historic settlements of farmsteads and late Mediaeval villages are characteristics as are historic routeways.

The High Weald AONB Management Plan is the strategy for looking after the High Weald AONB in order to achieve the statutory purpose of conserving and enhancing the High Weald AONB. The Management Plan can be used to guide environmental land management and assess the impact of development or other changes on the High Weald AONB.

National planning policy and guidance is clear that great weight should be given to conserving and enhancing the landscape and scenic beauty of AONBs and its wildlife and cultural heritage. These areas along with National Parks and the Broads have the highest status of protection (NPPF, July 2021: paragraph 176).

As such, this District Plan places great importance on protecting the High Weald AONB such as through Policy DPC4. This approach is also in line with national policy which makes clear that the scale and extent of development in protected landscapes should be limited (NPPF, July 2021: paragraph 176). In assessing potential housing sites and identifying proposed site allocations, protection of the High Weald AONB was central to the site selection process.

As part of the evidence base for this District Plan, two topic papers have been prepared that assess the impact of potential housing sites on the High Weald AONB and also assess if the proposed site allocations could be considered as major development in line with paragraph 177 of the NPPF (July 2021). The national policy position is that major development should not be permitted other than in exceptional circumstances and where they are in the public interest.

Making Effective Use of Land

Strategic Objectives met

1 - Sustainable Development and Adaptation to Climate Change
 2 - Maintaining Settlement Identity and Character
 3 - To protect valued landscapes
 9 - Create and Maintain Town and Village Centres
 12 - Support Safe, Healthy and Inclusive Communities

District Plan Policies

DPB1: Character and Design
DPC1: Protection and Enhancement of the Countryside

How?

Making effective use of land means maximising opportunities for reusing brownfield sites and ensuring that the full potential of a site is considered when proposals are put forward. It also means that, where greenfield sites are required, development is planned at an appropriate density to make efficient and effective use of the site.

Development that makes effective use of land meets the Plan's Strategic Objectives in supporting sustainable communities by delivering development in, typically, existing urban areas close to existing services and facilities. An increased customer base can help support these services and spark investment. Bringing vacant sites back into use can improve the street scene making places safer and more attractive to live and work. The reuse of buildings can avoid the release of energy embedded in existing materials and incorporate improvements such as biodiversity net gain, thereby helping to reduce the district's carbon footprint and adapt to the impacts of climate change.

Why?

As a predominately rural district opportunities for brownfield development are largely limited to the main towns and larger towns and villages. Unlike some neighbouring authorities, the opportunity for the large-scale redevelopment of brownfield sites, such as ports or traditional industries, is minimal. Ensuring that land within the district is used effectively is an important consideration in the preparation of this District Plan and in achieving its strategic objectives, particularly around creating sustainable communities and reducing pressures on the countryside.

National planning policy (NPPF chapter 11) and guidance:

- promotes the use of previously developed land (PDL) or 'brownfield' land wherever possible;
- encourages the consideration of various and innovative approaches to accommodating growth; and

- supports a proactive approach in identifying opportunities to bring forward suitable brownfield land to help meet development needs.

To support the above, an Urban Capacity Study (UCS) was commissioned to assess the potential quantum of new housing that could be delivered from brownfield sites, thereby contributing towards the district’s housing need.

The UCS considers the potential from brownfield sites in detail, recognising that there are often feasibility issues, neighbouring uses to consider, and that development of brownfield sites are often challenging in viability terms due to existing land values and clear-up costs.

Growth at existing sustainable settlements where it continues to be sustainable to do so

Strategic Objectives met	<p>1 - Sustainable Development and Adaptation to Climate Change 2 - Maintaining Settlement Identity and Character 3 - To protect valued landscapes 5 - Create and Maintain Green Infrastructure 6 - Infrastructure to Support Sustainable Communities 7 - Encourage Business and Thriving Local Enterprise 8 - Opportunities to Live and Work within Communities 9 - Create and Maintain Town and Village Centres 12 - Support Safe, Healthy and Inclusive Communities 13 - Provide Housing to Meet Community Needs 14 - Create Accessible Environments 15 - Provide Cultural, Leisure and Sporting Facilities</p>
District Plan Policies	<p>DPS6: Health and Wellbeing DPC2: Preventing Coalescence DPB1: Character and Design DPT1: Placemaking and Connectivity DPT4: Active Travel DPH1: Housing DPI1: Securing Infrastructure DPI4: Communications Infrastructure</p>

How?

Promoting growth at existing sustainable settlements meets the Plan’s Strategic Objectives by ensuring development can be directed away from protected landscapes within the district towards locations which benefit from existing infrastructure and services. Growth at these locations can contribute towards improved and/or new facilities to the benefit of all the community.

Increased population can also provide additional support for local businesses and town/village centres through increased patronage and staffing. Sustainable expansion of an existing settlement will help provide the critical mass to support viable sustainable travel solutions and improved active travel connectivity for all the community, reducing the need to travel by car and reducing the district’s carbon footprint.

Why?

It is necessary to manage the location and scale of housing and employment space across the district and this Plan provides the opportunity to protect what we know is special while taking responsibility to shape future development positively, for all our residents and visitors.

The District Plan, in providing a land use framework for Mid Sussex, seeks to manage change in the most sustainable way possible. We have a responsibility to ensure that change and the new places we create meet our current and future needs and can be designed in a way that is equally as rich, maintains local distinctiveness and is fully inclusive to all members in our community.

The Plan aims to support sustainable development. This element of the proposed strategy is a continuation of the 2018 District Plan Strategy and subsequent Site Allocations DPD; focusing development towards the three main towns primarily and supporting proportionate growth at other settlements to meet local needs and support the provision or retention of local services.

In order to maintain and enhance existing sustainable settlements in the Plan, careful account has been given to the characteristics of each settlement, their role and function and not simply their size, along with the infrastructure and services they support in order to determine the extent of new growth they can accommodate sustainably. It is recognised that sustainability is based on many factors and, a wide range of development will be welcomed where it that helps existing centres to provide a mix of uses and continue to be hubs for communities, by providing employment, services, retail and social facilities.

The approach to expand existing settlements can also help support delivery of 20-minute neighbourhood principles by increasing housing density and creating compact and well-connected places, investing in and expanding existing sustainable and active travel links within the more sustainable settlements in Mid Sussex, enabling residents to easily access a range of services that meet their day to day needs either by active travel modes or public transport. Supporting the 20-minute neighbourhood principles, the Plan also aims to support better opportunities for villages to work collectively with other settlements to provide safe and sustainable access to a better range of services for their shared community as a connected network.

When is it no longer sustainable?

The quality of the environment in Mid Sussex is not limited to those areas recognised by National designations, the district is formed of a wealth of landscape, cultural and heritage assets which contribute to the rich character, making it a desirable place to live and work.

Whilst development already planned for (for example, District Plan, Sites DPD and Neighbourhood Plan allocations) is consistent with the adopted strategy, it is becoming more challenging to deliver future growth in accordance with this strategy. This limits capacity for further sustainable at some settlements.

There are a number of significant constraints which need to be taken into account when assessing whether future growth is compliant with this element of the strategy. The availability of sites which continue to be capable of accommodating sustainable growth has become much more limited, particularly at East Grinstead and Haywards Heath and larger villages. The Plan can therefore only accommodate a proportion of housing need sustainably through expansion of existing settlements and the Strategy has had to evolve in order to meet the needs of the district sustainably.

The Site Selection process will assist in determining the extent development can be delivered in accordance with this element of the strategy.

Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable

Strategic Objectives met

- 1 - Sustainable Development and Adaptation to Climate Change
- 3 - To protect valued landscapes
- 5 - Create and Maintain Green Infrastructure
- 6 - Infrastructure to Support Sustainable Communities
- 7 - Encourage Business and Thriving Local Enterprise
- 8 - Opportunities to Live and Work within Communities
- 9 - Create and Maintain Town and Village Centres
- 10 - Support Strong and Diverse Rural Economy
- 12 - Support Safe, Healthy and Inclusive Communities
- 13 - Provide Housing to Meet Community Needs
- 14 - Create Accessible Environments
- 15 - Provide Cultural, Leisure and Sporting Facilities

District Plan Policies

- DPS6:** Health and Wellbeing
- DPB1:** Character and Design
- DPT1:** Placemaking and Connectivity
- DPT4:** Active Travel
- DPH1:** Housing
- DPI1:** Securing Infrastructure
- DPI4:** Communications Infrastructure

How?

This element of the District Plan strategy recognises that there are some settlements that are less sustainable, but there are opportunities for growth. By planning for a quantum of development which would support provision of new facilities – such as education, health, retail, employment, community and open space this would not only meet the needs of new residents but would also provide much needed facilities for existing communities which would allow these settlements to be more sustainable, reducing reliance on the private car, and embracing the principle of 20-minute neighbourhoods.

Significant scale development can also better support more diverse needs in housing with affordable and specialist extra care and older persons accommodation making the settlement more inclusive and overall, more sustainable.

Why?

The existing District Plan Strategy and planning policy more generally has historically sought to resist all but small-scale growth at smaller rural settlements on the basis they are currently unsustainable. The result of which has reinforced a strong reliance on use of the private car to access all but the most basic of services and needs in neighbouring larger settlements. Such small scale, sometimes piecemeal development, has increased population size but not reached a critical mass to support new facilities and services.

Many villages have seen the closure of the local public house(s) and convenience shops and the impact of tidal movements of cars and residents leaving to access school, work and leisure during the day has resulted in lack of patronage for existing village services and impacted on the sense of community in some places. Many rural villages are also often characterised by higher priced properties and ageing population, where affordability is limiting the opportunities for many younger people to remain in the village. Equally, a lack of suitable and specialist accommodation for older people often leads to people being forced to move away from the village to get the support they need.

The proposed strategy is therefore seeking to extend existing less sustainable communities, which currently have the benefit of only limited services, with development of a scale which can provide the infrastructure and services which will not only meet the needs of the new community but of those in the existing community as well.

This can be achieved by developing a single large site providing facilities and services on site; or a combination of smaller sites, that on their own would not deliver sustainable development, but collectively would support new schools, neighbourhood centres and employment opportunities. This strategy will help to reduce the tidal flow of people out of the settlement each day by providing new neighbourhood centres with potential for appropriate scale commercial development and new schools, along with affordable and specialist extra care housing and accommodation for older people in the community.

Based around the 20-minute neighbourhood principles, the Plan seeks to deliver complete, compact and well-connected communities which provide the facilities and services to support the day to day needs of the community as a whole, accessed by walking, wheeling and cycling. The Plan will also seek to support the continued trend of home working and the many associated benefits it can bring to our communities in terms of wellbeing and life/ work balance, supporting local businesses and services, reducing the need to travel by car.

Poor digital connectivity can however be a significant barrier in our more rural communities. Delivery of growth at these settlements can also support delivery of advanced digital infrastructure with fast reliable broadband speeds, where currently network providers deem it unviable to do so, which is key to supporting successful home working. The increased quantum of development will also enable viable support for improved bus services along with active travel links to nearby settlements to access train services, facilities and goods in our main towns and will be to the benefit of the whole community.

Spatial Strategy - Distribution

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will include the Spatial Strategy - Distribution]

Settlement Hierarchy

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will include the Settlement Hierarchy]

7. Policies

The following sections contain planning policies which will be used by the District Council when determining planning applications.

The policies are supported by the conclusions reached within the evidence base and in compliance with national policy requirements. The background to each policy/section and the supporting evidence used to justify such a policy is set out.

Strategic and Non-Strategic Policies

The NPPF (paragraph 21) requires Local Plans to clearly indicate which policies are “Strategic” and “Non-Strategic”. This is indicated next to each policy. The definition is as follows:

- **Strategic Policies:** should set the overall strategy for the pattern, scale and design quality of places and make provision to meet needs (e.g., housing, employment and retail), infrastructure, community facilities and the conservation and enhancement of natural and built environment. Strategic policies should look ahead over a minimum 15-year period from adoption – it is anticipated this Local Plan will be adopted in 2024, therefore strategic policies look forward to 2039.
- **Non-Strategic Policies:** these policies set out more detail for specific areas, neighbourhoods or types of development and can include allocating sites, provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and set other development management policies.

Policies within this District Plan should be read in conjunction with national policy and other policies within the Development Plan. This includes Neighbourhood Plans. Whilst Neighbourhood Plans cannot set Strategic Policies, they can include Non-Strategic Policies. Non-Strategic policies within the latest plan to be adopted/made take precedence where there is a conflict.

Policy Review Status

The District Plan Review indicated which of the current adopted policies required an update, which were still up-to-date and therefore do not need updating and highlighted additional areas where a new policy is required. For completeness, all District Plan policies that will form part of the development plan upon adoption are completed within this updated District Plan.

The review status is indicated next to each policy. Appendix 1 sets this out in summary form and also indicates which current policy it will supersede upon adoption. The review status is one of the following:

- **No Update:** The policy continues to comply with national policy and the evidence base has determined it is still effective as it stands.
- **Minor Update:** The Policy only requires minor amendments (such as factual updates) that do not change the overall meaning or direction of the policy.

- **Major Update or New Policy:** Changes in national policy or updated evidence suggests that the policy may require updating in full or that new Policies are required.

Policy Themes

The District Plan policies are contained within the following themed sections:

Sustainability
Natural Environment and Green Infrastructure
Countryside
Built Environment
Transport
Economy
Sustainable Communities
Housing
Infrastructure

8. Sustainability



Sustainability	DPS1: Climate Change H4: Sustainable Design and Construction DPS3: Renewable and Low Carbon Energy Schemes DPS4: Flood Risk and Drainage DPS5: Water Infrastructure and the Water Environment DPS6: Health and Wellbeing
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DPS1: Climate Change

Policy: Review Status: Strategic Objectives:	Strategic New Policy 1 – Sustainable Development and Adaptation to Climate Change 5 – Create and Maintain Green Infrastructure
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The impacts of climate change are seen in both the built and natural environment. The planning system is a tool that provides an opportunity to minimise vulnerability to the effects of climate change. Policy DPS1 is an overarching policy that sets out principles and signposts to other more detailed policies. It sets out that the Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change.

All development can play its part in taking action on climate change, however, the opportunities and measures available may vary depending on the type of development. Applicants will need to consider climate change at an early stage and incorporate measures to:

- Reduce carbon emissions
- Maximise carbon sequestration
- Adapt to and mitigate for climate change

DPS1: Climate Change

The Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change. This will be achieved by:

Reducing carbon emissions

- a. Development will be expected to demonstrate that measures have been taken to reduce carbon emissions, including improvements in energy efficiency and in the design and construction of buildings. This includes new buildings and the conversions of existing buildings. Detailed requirements are set out in Policies DPS2: Sustainable Design and Construction, DPS3: Renewable and Low Carbon Energy Schemes, and the Design Guide SPD.
- b. The Council will support renewable and low carbon energy schemes in line with the requirements set out in Policy DPS3: Renewable and Low Carbon Energy Schemes.
- c. Development should adopt the principles of the 20-minute neighbourhood and 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. Detailed requirements are set out in Policies DPT1: Placemaking and Connectivity; DPT3: Active Travel; and DPB1: Character and Design.
- d. Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be expected to demonstrate that opportunities have been taken to reduce these emissions. This includes proposals that may use these other greenhouse gases in their design and operation, for example, refrigerants and air conditioning systems.

Maximising carbon sequestration

- e. Development should protect existing trees, woodland and hedgerows and seek opportunities to plant appropriate species of trees in appropriate places. Detailed policy requirements are set out in Policy DPN4: Trees, Woodland and Hedgerows.
- f. Development will be expected to protect existing carbon sinks and take opportunities to provide nature-based solutions for carbon capture.
- g. Development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPS2: Sustainable Design and Construction.

Climate change adaptation and mitigation

- h. Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply. Detailed policy requirements are set out in Policies DPS2: Sustainable Design and Construction; DPS4: Flood Risk and Drainage; and DPS5: Water Infrastructure and the Water Environment.
- i. Development will be expected to incorporate green infrastructure and nature-based solutions to moderate surface and air temperatures, increase biodiversity and as part of sustainable drainage systems. Detailed requirements are set out in Policies DPB1: Character and Design; DPS4: Flood Risk and Drainage; and DPN3: Green Infrastructure.
- j. Development will be expected to achieve a net gain in biodiversity and contribute to ecological networks. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.

- k. The Council will seek adaptation and mitigation measures that improve resilience to climate change and allow communities, businesses, buildings, infrastructure and ecology to adapt to the impacts of climate change.

DPS2: Sustainable Design and Construction

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change

All development in its design, construction, operation and use will be expected to contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability. Applicants will need to consider:

- Measures that move towards zero carbon development;
- Energy use;
- Preventing overheating;
- Water resources and water efficiency;
- Soil protection; and
- Minimising waste.

To help ensure development design and construction contributes to the reduction of carbon emissions and delivers a sustainable development, the BREEAM sustainability assessment method will be utilised and applied.

BREEAM is an industry recognised sustainability assessment and rating methodology. Assessment and rating certification is delivered through accredited third-party assessors. BREEAM assessments consider a wide range of sustainability factors and are completed throughout the lifecycle of the development. The assessments include an analysis of energy use, health and wellbeing, innovation, land use, materials, management, pollution, transport, waste and water.

Where applicable, consideration of how the appropriate design standard will be achieved must start at the inception stage of the design process in order to maximise the developments potential to more easily achieve the highest scores and details should be set out in the accompanying Design and Access Statement, including evidence of registration of the project with BRE. Unless otherwise agreed, compliance with BREEAM and Home Quality Mark (HQM) standards shall be demonstrated via formal certification. Equivalent standards for buildings by nationally recognised certification bodies may also be accepted, such as Passivhaus or AECB standards.

According to the Department for Environment Food & Rural Affairs (UK Statistics on Waste July 2021) the development industry made up over half (62%) of the UK's total waste production in 2018 from construction, demolition and excavation. In addition, a notable proportion of materials delivered to building sites are never used and go straight to waste.

In order to help move away from a linear economy where products are made to be used and sent to waste, and towards a circular economy which looks to minimise waste production all

developments will be expected to demonstrate how they will follow the waste hierarchy and avoid any avoidable waste production and disposal. This can be achieved by:

- prioritising the use of previously developed land and buildings,
- reusing and recycling of appropriate materials that arise through demolition and refurbishment, including the reuse of non-contaminated excavation soil and hardcore within the site,
- prioritising the use of locally sourced and/ or sustainable materials and construction techniques, and
- using resilient, low maintenance materials

DPS2: Sustainable Design and Construction

All developments are required to submit a Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability.

Prioritise retention and retrofit of existing buildings or structures to capture the embodied energy associated with the building's original construction, unless it can be demonstrated to be unviable to do so.

Development, as defined below, will be required to meet the relevant minimum defined standards until they are superseded by higher national standards.²

Towards zero carbon development

Unless it can be demonstrated that doing so is not technically feasible or unviable, development will be required to achieve the minimum standards below:

Development Type	Scale of Development	Minimum Standard
Residential new build	Up to 150 dwellings	HQM 3 Star*
Residential new build	> 150 dwellings	HQM 3.5 Star*
Residential Refurbishment	Major	HQM 3 Star*
Non-residential new build ³	All	BREEAM Excellent**
Non-residential Refurbishment	Over 500m ²	BREEAM Excellent - Refurbishment and Fit-Out Technical Standards**
Significant site allocations – Residential new build - DPSC1 – DPSC3	1000+	HQM 4 Star*

² References to major development are as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

³ Defined as development falling outside of Use Class C3 as defined by The Town and Country Planning (Use Classes) Order 1987 (as amended).

* Developments must achieve a minimum score of 50 credits in the energy category and 12 in the water category.

**Developments must achieve an 'Outstanding' rating in energy and water categories and demonstrate reasonable endeavours to achieve an 'Outstanding' rating overall.

Assessment frameworks

Planning applications should be accompanied by a pre-assessment, demonstrating how the BREEAM Technical Standards and/or Home Quality Mark (HQM) Star rating, or any future replacement standards, will be met. Evidence demonstrating the project has been registered with BRE during the design stage shall be submitted with any application and conditions will be imposed to secure appropriate certification to demonstrate compliance with this policy.

Householder development

Proposals for householder development are encouraged to be as energy efficient and sustainable as possible incorporating the principles of both this policy and Policy DPS1: Climate Change.

Energy use

All new developments should follow the energy hierarchy to contribute to reducing carbon emissions: being lean (using less energy), being clean (supplying energy efficiently) and being green (using renewable energy).

Demonstrate how opportunities for incorporating decentralised, renewable and low carbon energy schemes have been taken into all new development in line with Policy DPS3: Renewable and Low Energy Carbon Schemes.

Prevent overheating

All new development shall demonstrate how design measures have been incorporated to:

- minimise potential overheating such as through the layout, orientation and design of buildings;
- maximise passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided. Green and blue infrastructure should be incorporated in line with Policy DPN3: Green Infrastructure to provide natural cooling and shading.

Water resources and water efficiency

New development proposals must accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water resources, water quality, water supply and wastewater treatment.

To achieve the sustainable water consumption rates above all development must demonstrate that opportunities have been taken to incorporate measures to reduce water use and reuse water including:

- Water efficient fittings and appliances;
- Rainwater harvesting;
- Greywater recycling; and
- Sustainable drainage systems in accordance with Policy DPS4: Flood Risk and Drainage.

All development will be required to meet the relevant minimum standards set out above until they are superseded by higher national standards.

Specific water consumption and efficiency requirements will be required for significant sites and are detailed in those policies.

Soil

Best practice should be complied with to protect soils during construction from compaction, pollution and erosion. Undisturbed soils should be protected and measures should be taken to minimise sterilisation of soils by permanent impermeable surfaces.

Minimise waste

In accordance with relevant policies in the West Sussex Waste Local Plan, all development will be required to support the circular economy by minimising construction, demolition and excavation waste disposed of in landfill and follow the waste hierarchy to maximise recycling and re-use of material.

New development shall be designed with adequate and easily accessible storage space that supports separate collection of dry recyclables and food waste, as well as residual waste taking account of guidance in the Mid Sussex Design Guide SPD.

DPS3: Renewable and Low Carbon Energy Schemes

Policy: Strategic
Review Status: Minor Update
Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change

Carbon emissions in Mid Sussex reduced by 38% between 2005 and 2018⁴, supported by a reduction in fuel consumption and an increase in cleaner sources of energy. Over the same 13-year period, fuel consumption in Mid Sussex fell by 9.5% to 3,048.4 GWh. The largest consumer sector remains the Domestic sector followed by Road Transport and Industry & Commercial.

The Mid Sussex Sustainable Energy Study (2014) assessed the potential for renewable energy schemes in Mid Sussex and concluded that the level of technical and capacity constraints in the District were likely to prevent major new renewable energy schemes from coming forward over the Plan period. Renewable energy schemes were likely to be relatively small-scale and the local community could have a key role through Neighbourhood Plans or other local initiatives. Such projects could help support energy security, respond to fuel

⁴ Source: Department for Business, Energy & Industrial Strategy, 2020 (CO₂ emissions estimates 2005-2018 in Mid Sussex (tonnes per capita))

poverty, reduce carbon emissions and provide a longer-term financial return for communities.

The National Planning Policy Framework (paragraph 155, NPPF) lists the use of renewable resources, including the development of renewable energy, as a core planning principle. Paragraphs 155 and 156 of the NPPF requires local planning authorities to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily and support community-led initiatives for renewable and low carbon energy.

In relation to Gatwick Airport, any proposed development would need to comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. Schemes such as large banks of solar panels will need to be assessed at an early stage as they have the potential to impact on navigational aids at the airport.

DPS3: Renewable and Low Carbon Energy Schemes

Proposals for new renewable and low carbon energy projects (other than wind energy development – see below), including community-led schemes, will be permitted provided that any adverse local impacts, including cumulative, can be made acceptable, with particular regard to:

- i. Landscape and visual impacts such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;
- ii. Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;
- iii. Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access.

Proposals for wind energy development involving one or more wind turbines will be granted if:

- the development site is in an area identified as suitable for wind energy development in the 2014 Sustainable Energy Study, or as updated;
- the development is of an appropriate scale; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Assessment of impacts will need to be based on the best available evidence, including landscape capacity studies.

Opportunities for incorporating decentralised, renewable and low carbon energy schemes into all new development should be considered from the outset utilising the Mid Sussex Design Guide SPD.

For all new proposals, there should be appropriate plans and mechanisms in place for the removal of the installation on cessation of generation and restoration of the site to either its original use or an acceptable alternative use.

DPS4: Flood Risk and Drainage

Policy:	Strategic
Review Status:	No Update
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change

The district is generally an area of low flood risk. The main flood risk is from surface water (pluvial), followed by risk from rivers and streams (fluvial). The Strategic Flood Risk Assessment identifies areas that are at risk from flooding from a range of sources and has been used to inform the preparation of the District Plan. Strategic Flood Risk Assessment mapping is kept up-to-date with new flood events and updated releases of information from the Environment Agency.

The Strategic Flood Risk Assessment provides information on the use of Sustainable Drainage Systems (SuDS) to avoid increased flood risk or adverse impact on water quality. Well-designed SuDS rarely function with only a single purpose and should be considered early in the design process due to their relationship with other design considerations. The Mid Sussex Design Guide SPD contains advice and examples of incorporating SuDS into developments.

Guidance on the potential benefits, suitability and feasibility for different SuDS types is available in the 'Water. People. Places.' document prepared for South East England authorities. This guidance should be used as part of the initial planning and design process for all types of residential, commercial and industrial development.

Development proposals in areas at risk of flooding will be considered in accordance with the National Planning Policy Framework (paragraphs 166, 167 and 168). Development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with paragraphs 167 and 168 of the NPPF.

The 2020 Gatwick Sub Region Water Cycle Study provides an assessment of the capacity of current water infrastructure to accommodate growth without adversely affecting the environment. The Study sets out a number of recommendations that address capacity and quality issues identified in the Study, summarised in Section 13.2. The use of Sustainable Drainage Systems (SuDS) continue to have an important role in managing flood risk, with added potential benefits on water resources, climate resilience, water quality, biodiversity and amenity.

DPS4: Flood Risk and Drainage

Proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. The District Council's Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from a range of sources including fluvial (rivers and streams), surface water (pluvial), groundwater, infrastructure and reservoirs.

Particular attention will be paid to those areas of the District that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates.

Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development⁵ unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality.

Arrangements for the long-term maintenance and management of SuDS must also be identified through a maintenance and management plan, to be secured by condition at planning application stage.

For the redevelopment of brownfield sites, any surface water draining to the foul sewer must be disconnected and managed through SuDS following the remediation of any previously contaminated land.

SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible.

The preferred hierarchy of managing surface water drainage from any development is:

1. Infiltration Measures,
2. Attenuation and discharge to watercourses; and if these cannot be met,
3. Discharge to surface water only sewers.

Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies.

DPS5: Water Infrastructure and Water Environment

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 6 – Infrastructure to Support Sustainable Communities

Mid Sussex District is located in an area of serious water stress. Development must be positively planned to minimise its impact on water resources and water quality and to provide resilience against the impacts of climate change including security of water supply.

A growing population and an increase in development will place pressure on wastewater treatment works, with some having limited available capacity to meet these needs.

Developers will be required to demonstrate that there is adequate capacity or additional infrastructure can be provided in time both on and off the site to serve the development and that it would not lead to problems for existing users. Developers will need to show that they have engaged with service providers at the earliest opportunity to establish the proposed development's demand for water supply and wastewater infrastructure and how this can be met. In some circumstances this may make it necessary for developers to carry out

⁵ As set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010.

appropriate studies to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure.

It is essential to ensure that infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Where there is a capacity constraint and no improvements are programmed by the statutory undertaker the developer will need to contact the statutory undertaker/s to agree the improvements required and how these will be funded prior to any occupation of the development.

DPS5: Water Infrastructure and Water Environment

Development should protect and enhance water resources and water quality and take measures to control pollution of the water environment. Development will only be permitted where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs.

Water infrastructure

Development proposals which increase the demand for off-site water service infrastructure will be permitted where the applicant can demonstrate:

- that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and
- that there is adequate water supply infrastructure to serve the development. Where water supply infrastructure is not sufficient or available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation.

Planning conditions and/ or obligations will be used to secure necessary infrastructure provision.

Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water environment.

The development or expansion of water supply or sewerage/ sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long-term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.

DPS6: Health and Wellbeing

Policy: Strategic
Review Status: New Policy

Strategic Objectives:

- 1 – Sustainable Development and Adaptation to Climate Change
- 5 – Create and Maintain Green Infrastructure
- 6 – Infrastructure to Support Sustainable Communities
- 12 – Support Safe, Healthy and Inclusive Communities
- 13 – Provide Housing to Meet Community Needs
- 14 – Create Accessible Environments
- 15 – Provide Cultural, Leisure and Sporting Facilities

The built and natural environment is a determinant of health and wellbeing. The places where people live and work can affect health and wellbeing both positively and negatively. The design and quality of neighbourhoods can create opportunities to facilitate healthy lifestyles such as through the provision of green space, inclusive design, adopting the principles of a 20 minute neighbourhood and supporting the ability to choose to walk and cycle over the use of the private car. The design and quality of neighbourhoods can also exacerbate health inequalities such as through the convenience of unhealthy food choices or high levels of pollution or crime.

Whilst Mid Sussex is one of the least deprived areas in the country, there are opportunities to improve health and wellbeing through the creation and management of a high quality built and natural environment. This policy sets out the measures that development must take to ensure a positive impact on health and wellbeing and to enable healthy lifestyles.

This policy primarily relates to new residential and commercial development, however, all development, including householder development, can contribute to enabling healthy lifestyles such as by incorporating measures to reduce crime and to provide resilience against the effects of climate change.

Proposals for major residential and commercial development need to undertake a screening for a Health Impact Assessment (HIA). A Health Impact Assessment is a useful tool that helps to identify the health impacts of a proposed plan or project and can ensure future health and wellbeing needs are met. An HIA makes recommendations to maximise the positive health and wellbeing impacts, minimise the negative health and wellbeing impacts and reduce health inequalities.

DPS6: Health and Wellbeing

All new development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Mid Sussex, as identified in the Joint Strategic Needs Assessment and West Sussex Joint Health and Wellbeing Strategy.

In order to maximise opportunities to enable healthy lifestyles, all new development must (where applicable for the type of development proposed):

- i. Be of high quality in its design and construction and be set within an attractive environment;
- ii. Be well-designed to ensure legibility of layout and the public realm including through the use of materials;
- iii. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime;
- iv. Prioritise active travel such as walking and cycling and sustainable transport such as public transport;
- v. Incorporate green infrastructure and biodiversity;

- vi. Provide opportunities for both high quality private outdoor space and publicly accessible open and green space;
- vii. Support and facilitate healthy eating including through the provision, where possible, of local and domestic food production such as allotments, community growing spaces and community orchards;
- viii. Be supported by the necessary infrastructure;
- ix. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, socialise and interact;
- x. Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, air quality, crime, access to education and employment, and local amenity; and
- xi. Incorporate measures to provide resilience against the effects of climate change including overheating, flood risk and drought.

Detailed policy requirements are set out elsewhere in this Plan.

Proposals for major residential and major commercial developments* must set out how they address the requirements of this policy as part of a planning application. In order to satisfy this policy requirement, applicants will need to undertake a screening for a Health Impact Assessment (HIA). If necessary, a full HIA proportionate to the development proposed, will need to be prepared to demonstrate the health outcomes on the health and wellbeing of communities.

*As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

9. Natural Environment and Green Infrastructure



Natural Environment and Green Infrastructure	DPN1: Biodiversity, Geodiversity and Nature Recovery DPN2: Biodiversity Net Gain DPN3: Green 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
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DPN1: Biodiversity, Geodiversity and Nature Recovery

Policy: Review Status: Strategic Objectives:	Strategic Major Update 3 – Protect Valued Landscapes 5 – Create and Maintain Green Infrastructure
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Biodiversity and geodiversity are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery is important for delivering improvements to nature, ecological networks and green infrastructure.

The District has a number of valued landscapes, habitats and species that need to be protected and enhanced. There are :

- 13 Sites of Special Scientific Interest (SSSI)
- 50 Local Wildlife Sites (LWS)
- 6 Local Nature Reserves (LNR)
- Over 1,400 areas of ancient woodland covering over 5,200Ha.
- Priority habitats found in Mid Sussex including ancient woodland, coastal & floodplain grazing marsh, deciduous woodland, ghyll woodland, lowland calcareous grassland, lowland fen, lowland heathland, lowland meadow, reedbed, traditional orchard, and wood-pasture & parkland.

Whilst designated nature conservation sites and priority habitats are of significant value, the overall ecological network of habitats and species is important for biodiversity and nature recovery. The fragmentation of habitats and deterioration of the wider ecological network is a threat to biodiversity and nature recovery particularly in the context of climate change.

Soil is a valuable natural resource and is under threat from loss and degradation. The structure and health of soil is important for food production, biodiversity and carbon storage. Development should protect and enhance soils.

All development can contribute to biodiversity improvements and nature recovery and it is expected that development incorporates biodiversity features; restores, enhances and creates ecological networks; and delivers green infrastructure. Development should align with the objectives and priorities of the Local Nature Recovery Strategy and other relevant local strategies.

DPN1: Biodiversity, Geodiversity and Nature Recovery

Biodiversity and geodiversity are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery is important for delivering improvements to nature, ecological networks and green infrastructure.

Development proposals will also need to be in accordance with DPN2: Biodiversity Net Gain.

Biodiversity will be protected and enhanced by ensuring development:

- Protects existing biodiversity by retaining features of interest, including connecting routes as part of wider ecological networks, and ensuring the appropriate long-term management of those features;
- Takes appropriate measures to avoid and reduce disturbance to sensitive habitats and species in accordance with the mitigation hierarchy set out in national policy. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances and as a last resort);
- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments;
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience;
- Promotes the restoration, management and expansion of priority habitats in the District; and
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Local Wildlife Sites, Local Nature Reserves and irreplaceable habitats such as Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including priority habitats, wildlife corridors, ancient, aged or veteran trees, Biodiversity Opportunity Areas, areas identified for nature recovery, and Nature Improvement Areas.

Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks and nature recovery.

Soils are important for biodiversity and carbon storage. Soils will be protected and enhanced, including the best and most versatile agricultural land, by development

avoiding soil disturbance, compaction and erosion. Development should not result in soil pollution.

Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites.

Development should seek to meet the objectives of the Local Nature Recovery Strategy, taking opportunities to deliver ecological networks and green infrastructure. Development will need to demonstrate that it will not harm or adversely affect an area or areas identified as opportunities for nature recovery.

DPN2: Biodiversity Net Gain

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	3 – Protect Valued Landscapes 5 – Create and Maintain Green Infrastructure

The requirement for mandatory biodiversity net gain was introduced by the Environment Act 2021. Biodiversity net gain seeks to deliver measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be delivered on-site, off-site or through a combination of on-site and off-site measures, however, the implementation of biodiversity net gain should align with the local objectives and priorities for biodiversity improvements and nature recovery.

The mitigation hierarchy set out in the National Planning Policy Framework should be followed: firstly by avoiding harm to biodiversity, then providing mitigation with compensation as a last resort.

The Council will encourage development to maximise opportunities to deliver higher levels of biodiversity net gain especially where development is located in or in proximity to the Biodiversity Opportunity Areas or priority habitats.

DPN2: Biodiversity Net Gain

Development (as defined in the Environment Act 2021 or its secondary legislation or as amended by the government) will need to deliver a net gain in biodiversity which will contribute to the delivery of ecological networks, green infrastructure and nature recovery.

Development will need to demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately.

Principles of Biodiversity Net Gain

Development will need to demonstrate that good practice principles for biodiversity net gain have been followed.

Development will need to demonstrate that the mitigation hierarchy has been followed.

Proposals for biodiversity net gain will also need to be in accordance with Policies DPN1: Biodiversity, Geodiversity and Nature Recovery; DPN3: Green Infrastructure; and DPN4: Trees, Woodland and Hedgerows, and avoid harm to irreplaceable habitats, protected sites and priority habitats.

Biodiversity net gain, including off-site biodiversity net gain, should align with the objectives and priorities of the Nature Recovery Network, Local Nature Recovery Strategy and other relevant local strategies, contributing and connecting to wider ecological networks and green infrastructure. Consideration should be given to landscape character when developing proposals for biodiversity net gain.

It is expected that development proposals will enhance existing biodiversity and incorporate features to encourage biodiversity and pollination within and around the development.

Level of Biodiversity Net Gain

Biodiversity net gain will be calculated and assessed using the Government's published biodiversity metric. The biodiversity net gain calculation and assessment should be completed by a suitably experienced and qualified ecologist and submitted in full with the application for development.

The minimum percentage of biodiversity net gain required will be 10% as set out in legislation (or as amended by the government) or greater where it is required in another policy or a Supplementary Planning Document. The Council will encourage a higher level of biodiversity net gain and developments should seek to maximise opportunities, especially where development is located in or in proximity to the Biodiversity Opportunity Areas or priority habitats.

A minimum percentage of biodiversity net gain of 20% will be required on Significant Sites (DPSCx-x).

The Council will publish further guidance on delivering biodiversity net gain on its website. This guidance will be reviewed periodically to ensure it reflects local priorities and opportunities.

DPN3: Green Infrastructure

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	5 – Create and Maintain Green Infrastructure 6 – Infrastructure to Support Sustainable Communities 15 – Provide Cultural, Leisure and Sporting Facilities

Green infrastructure (including blue infrastructure) delivers a range of environmental, social and economic benefits including resilience to climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Existing green infrastructure assets, links and the overall multi-functional network will be protected and new green infrastructure will be encouraged as part of development

proposals. To ensure the existing green infrastructure network is protected, important green infrastructure assets and links will be safeguarded from development.

Land which will be required to create and deliver a multi-functional 'Green Circle' around Burgess Hill will be safeguarded from development. In particular, the following areas as shown on the Policies Maps will be safeguarded as green infrastructure and allocated for informal open space:

- Batchelors Field;
- Land south of Greenlands Drive;
- Nightingale Lane Meadows/ Nightingale Lane Open Space;
- Hammonds Ridge Meadows;
- Maltings Farm;
- Malthouse Lane Meadows;
- Eastlands Farm;
- Grassmere Meadow;
- Pangdene Lane Meadows;
- Land north of Sussex Way;
- Land to the north of Sheddingdean and Leylands Park;
- Bedelands Farm Local Nature Reserve;
- Land along the railway line to the north and south of Wivelsfield Station; and
- Land in the Northern Arc.

The following areas as shown on the Policies Maps will be safeguarded as green infrastructure and allocated for informal open space or linear open space:

- Land from Turvey Wood/ Franklands Wood to the Scrase Valley, Haywards Heath
- Ashenground and Bolnore Woods, Haywards Heath
- Ashplats Wood, East Grinstead
- Spring Copse, East Grinstead
- St. Margaret's Loop, East Grinstead
- Worth Way
- Forest Way

DPN3: Green Infrastructure

Green infrastructure (including blue infrastructure) delivers a range of environmental, social and economic benefits including resilience to the effects of climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Green infrastructure assets, links and the overall multi-functional network will be protected and enhanced by ensuring development:

- Responds to and incorporates existing on-site and off-site green infrastructure into the development design; and
- Provides new green infrastructure integrated into the development design; and
- Contributes to the wider green infrastructure network by taking opportunities to improve, enhance, manage and restore green infrastructure, and providing links to existing green infrastructure including outside the development's boundaries.

Applicants should 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.

Green infrastructure design will be expected to demonstrate that opportunities have been taken to:

- Strengthen connectivity and resilience of ecological networks; and
- Improve resilience to the effects of climate change; and
- Support health and wellbeing by providing access to green space, nature and rights of way.

Green infrastructure design should be informed by and respond to existing evidence and guidance on the multi-functional green infrastructure network including Biodiversity Opportunity Area statements, priority habitats, green infrastructure mapping, ecological surveys and landscape character assessments.

Appropriate arrangements and funding for the future long-term management and maintenance of green infrastructure should be identified and implemented. Where appropriate, the Council will seek to secure this via planning conditions and/or planning obligations.

To help deliver a multi-functional green infrastructure network and to protect existing green infrastructure assets and links, the Council has identified land to be safeguarded from development as shown on the Policies Map.

Land which will be required to create and deliver a multi-functional 'Green Circle' around Burgess Hill will be safeguarded from development and the 'Green Circle' will be allocated for informal open space as shown on the Policies Map.

Important green infrastructure assets and links will be safeguarded and allocated for informal open space or linear open space as shown on the Policies Maps.

DPN4: Trees, Woodland and Hedgerows

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes
	4 – Protected Built and Historic Environment
	5 – Create and Maintain Green Infrastructure

Trees, woodland and hedgerows make a valuable landscape, amenity and biodiversity contribution to the District, both in urban and rural areas. Mid Sussex is a heavily wooded district with two thirds of this being ancient woodland.

Trees, woodland and hedgerows form part of the District's green infrastructure, and in particular, are important for health and well-being, biodiversity, and increasing resilience to the effects of climate change.

Ancient woods are irreplaceable wildlife habitats with complex ecological conditions that have developed over centuries. They contain a wide range of wildlife including rare species,

however, because the resource is limited and highly fragmented, ancient woodland and their associated wildlife are particularly vulnerable and must be protected from damaging effects of adjacent and nearby land uses that could threaten the integrity of the habitat and survival of its special characteristics.

The District Plan recognises this contribution and will support the protection of trees, woodland and hedgerows, as well as encouraging new planting. Development will be required to incorporate trees, woodland and hedgerows into the design and landscaping scheme.

All hedgerows on farmland and open land are protected and consent is required from the District Council to remove them. The Hedgerow Regulations 1997 also define 'important' hedgerows as being of particular archaeological, historical, wildlife or landscape value.

The District Council will make Tree Preservation Orders or attach planning conditions, in line with national guidance, to protect specific trees, a group of trees or woodlands in the interests of amenity or where they are threatened by development. The amenity value of trees will take into account visibility and characteristics relating to the individual, collective and wider impact including:

- Size and form; and
- Future potential as an amenity; and
- Rarity, cultural or historical value; and
- Contribution to, and relationship with, the landscape; and
- Contribution to the character and appearance of a conservation area.

DPN4: Trees, Woodland and Hedgerows

Trees, woodland and hedgerows are valuable natural capital assets including for biodiversity, nature recovery, green infrastructure, health and wellbeing, and increasing resilience to the effects of climate change.

Protection of trees, woodland and hedgerows

The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and ancient, aged or veteran trees will be protected.

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, will not normally be permitted.

Development (including construction and operational activities) resulting in the direct or indirect deterioration or loss of irreplaceable habitats including ancient woodland and ancient, aged or veteran trees will not be permitted unless there are wholly exceptional reasons and in such circumstances, appropriate compensation measures will be provided.

New trees, woodland and hedgerows

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

Proposals for new woodland creation will need to follow best practice guidance and take into account a range of considerations including:

- The biodiversity and amenity value of the existing habitat; and
- The landscape and its character; and
- Heritage and archaeology features; and
- Protected species; and
- Opportunities for natural regeneration; and
- Opportunities to connect to and extend existing woodland; and
- The long-term management arrangements for new woodland planting; and
- Resilience to the effects of pests, disease and climate change.

Development and trees, woodland and hedgerows

Trees, woodland and hedgerows will be protected and enhanced by ensuring development:

- incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme;
- prevents damage to root systems and takes account of expected future growth; and where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management;
- has appropriate protection measures throughout the development process;
- secures appropriate long-term management arrangements;
- takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and
- does not sever ecological corridors created by these assets.

Works to trees

Proposals for works to trees, including felling, will be considered taking into account:

- the condition and health of the trees; and
- the contribution of the trees to the character and visual amenity of the local area; and
- the amenity and nature conservation value of the trees; and
- the extent and impact of the works; and
- any replanting proposals.

Inappropriate or excessive works to trees that will damage their health and/or amenity value will be resisted.

Proposals for works to trees, including felling, may be refused if sufficient information is not provided to justify why works are necessary.

The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.

Use of buffer zones

Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development

boundary. A buffer will also be required for ancient, aged and veteran trees and should be at least 15 times larger than the diameter of the tree or 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. The size of a required buffer zone may vary according to the nature of the site and the proposed development, and if there are other impacts likely to extend beyond the minimum buffer zone distance. Buffer zones should contribute to green infrastructure and wider ecological networks and consist of a semi-natural habitat with appropriate planting. These requirements for an ancient woodland or tree buffer will apply unless superseded by a more environmentally favourable national standard set out in legislation or guidance.

DPN5: Historic Parks and Gardens

Policy: Non-Strategic
Review Status: No Update
Strategic Objectives: 3 – Protect Valued Landscapes
11 – Support Mid Sussex as a Visitor Destination

There are 9 Registered Parks and Gardens of Special Historic Interest in Mid Sussex. In addition there are a large number of historic parks and gardens which are unregistered but which appear on the West Sussex Historic Environment Record. The need to protect such landscapes is also recognised.

DPN5: Historic Parks and Gardens

The character, appearance and setting of a registered park or garden, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park or garden, or park or garden of special local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden.

DPN6: Pollution

Policy: Non-Strategic
Review Status: New Policy
Strategic Objectives: 3 – Protect Valued Landscapes
12 – Support Safe, Healthy and Inclusive Communities

To protect people, their health and quality of life, and the natural environment, a suite of policies has been developed to prevent development resulting in pollution or hazards. This policy makes clear that all forms of pollution are included with more detailed policy requirements for noise impacts, light impacts, air quality, land stability and contaminated land. This policy also makes clear that mitigation measures may be necessary for development likely to increase levels of pollution.

The Council will publish detailed guidance on its website.

DPN6: Pollution

Development should not result in pollution or hazards, including air, noise, vibration, light, water, soil, odour, dust or other pollutants, which significantly adversely impact on people, including health and quality of life, and the natural environment, including nature conservation sites.

Mitigation measures may need to be implemented for development that is likely to increase levels of pollution, taking into account any cumulative impacts.

Development proposals will need to take into account the Council's published guidance⁶.

Detailed policy requirements are set out in Policies:

- DPN7: Noise Impacts
- DPN8: Light Impacts and Dark Skies
- DPN9: Air Quality
- DPN10: Land Stability and Contaminated Land

DPN7: Noise Impacts

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

New development needs to be managed to protect the natural environment and people's health and quality of life from unacceptable levels of noise.

Development proposals will need to take into account the Council's published guidance on noise impacts.

DPN7: Noise Impacts

The natural environment and people's health and quality of life will be protected from unacceptable levels of noise.

Areas valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting and nature conservation sites, will be protected from unacceptable levels of noise.

Development will only be permitted where it:

- avoids significant adverse impacts on health and quality of life; and
- mitigates and minimises adverse impacts on health and quality of life; and
- where possible, contributes to the improvement of health and quality of life.

Development will be expected to be located, designed and controlled to avoid or minimise any potential significant adverse impacts from noise. Development should have good acoustic design including orientating or organising buildings (including consideration of the internal layout of buildings) to locate more noise sensitive areas, such as the principal

⁶ [Air Quality and emissions mitigation guidance for Sussex \(2020\)](#)

habitable rooms, away from potential sources of noise. Parking arrangements should be carefully considered to avoid noise and headlight nuisance.

Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise, or other sources of high levels of noise such as commercial/ industrial sites or transport sources, unless adequate sound insulation measures, as supported by a noise assessment, are incorporated within the development.

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (existing or planned) will not be exposed to noise impact that will significantly adversely affect the amenity of existing and future users.

If required by the local planning authority, the applicant will be required to provide:

- an assessment of the impact of noise generated by a proposed development; or
- an assessment of the effect of noise by an existing noise source upon a proposed development.

Development proposals will need to take into account the Council's noise guidance.

DPN8: Light Impacts and Dark Skies

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

New development needs to be managed to protect the natural environment and people's health and quality of life from unacceptable levels of light pollution.

It is important that artificial light does not contribute to sky glow, glare and light spillage which impacts on the visibility of the night sky, biodiversity and local character. Dark night skies including those in protected landscapes should be valued and protected from light pollution.

DPN8: Light Impacts and Dark Skies

The natural environment and people's health and quality of life will be protected from unacceptable levels of light pollution.

Development proposals must demonstrate that all opportunities to reduce light pollution (including sky glow, glare and light spillage) have been taken including minimising impacts on local amenity, intrinsically dark landscapes including protected landscapes and areas important for nature conservation and nature recovery.

Artificial lighting proposals (including outdoor lighting, floodlighting and new street lighting) should be minimised in terms of intensity and number of fittings. The applicant should demonstrate that:

- the minimum amount of lighting necessary to achieve its purpose is specified or otherwise justified on safety or security grounds; and

- 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; and
- the means of lighting would be unobtrusively sited and well-screened by landscaping; and
- low energy lighting is used; and
- there would not be an adverse impact on wildlife such as through consideration of the appropriate colour of lighting.

Where lighting of a landmark or heritage feature is proposed, the level and type of illumination used would enhance the feature itself.

Development proposals will need to take into account the Institute of Lighting Professionals guidance and other relevant guidance.

DPN9: Air Quality

Policy:	Non-Strategic
Review Status:	Minor Update (to policy SA38 Site Allocations DPD)
Strategic Objectives:	3 – Protect Valued Landscapes
	12 – Support Safe, Healthy and Inclusive Communities

Air quality monitoring and modelling undertaken by the Council indicates that there is good air quality within most of the District. The main source of air pollution in the District is road traffic emissions mostly from major roads. Air pollution is associated with a number of adverse health impacts.

Mid Sussex District has one Air Quality Management Area (AQMA) at Stonepound Crossroads in Hassocks. It was declared in 2012 due to high levels of nitrogen dioxide and exceedances are attributed to the topography of the area and the volume of road traffic. Since the AQMA was declared there has been an overall reduction in measured nitrogen dioxide and various measures have been implemented designed to limit the exceedance of the nitrogen dioxide air quality objective.

DPN9: Air Quality

The natural environment and people's health and quality of life will be protected from unacceptable levels of poor air quality.

The use of active and sustainable travel measures and green infrastructure to reduce pollution concentrations and exposure is encouraged.

Development proposals will need to take into account the Council's air quality guidance.

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

Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council's current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2021 or as updated)) an air quality assessment will be required.

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

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

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

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

DPN10: Land Stability and Contaminated Land

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

It is important to consider ground conditions when preparing development proposals and any risks from land instability or contamination. Adequate and effective measures will be required to protect land stability and land quality, including measures to protect the natural environment and people from unacceptable risks.

DPN10: Land Stability and Contaminated Land

Development proposals should consider if a site is suitable for its proposed use taking into account ground conditions and any risks from land instability or contamination.

Investigations and assessments of sites located in or in close proximity to potentially unstable or contaminated land will be required to be submitted as part of a planning application. The investigations and assessment work should consider the nature and extent of the risk, and potential impacts to human health, adjacent land uses and the natural environment.

Adequate and effective measures will be required to protect land stability and land quality, including measures to protect the natural environment. In particular, measures should be taken to avoid:

- unacceptable risks to the health of future users and occupiers of the development or people in the locality;
- risks to the structural integrity of buildings or structures on or adjoining the site;
- contamination to soil, watercourses, water bodies, groundwater or aquifers;
- harm to wildlife and the natural environment.

10. Countryside



Countryside	<p>DPC1: Protection and Enhancement of the Countryside</p> <p>DPC2: Preventing Coalescence</p> <p>DPC3: New Homes in the Countryside</p> <p>DPC4: High Weald Area of Outstanding Natural Beauty</p> <p>DPC5: Setting of the South Downs National Park</p> <p>DPC6: Ashdown Forest SPA and SAC</p>
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DPC1: Protection and Enhancement of the Countryside

<p>Policy: Strategic</p> <p>Review Status: Minor Update</p> <p>Strategic Objectives:</p>	<p>3 – Protect Valued Landscapes</p> <p>11 – Support Mid Sussex as a Visitor Destination</p> <p>15 – Provide Cultural, Leisure and Sporting Facilities</p>
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Mid Sussex is a rural District, and the countryside is an asset that is highly valued by the Council and local residents and is recognised as having social value in enhancing the health and wellbeing of residents and visitors. The countryside is a working environment that needs to be managed in a way that enhances the attractiveness of the rural environment whilst enabling traditional rural activities to continue. The rural economy will be supported by other policies within this Plan that permit small-scale development and changes of use that will further economic activities that are compatible with the District's rural character. Its environmental worth will be protected and enhanced by the policies in this Plan.

The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there. At the same time, it seeks to enhance the countryside, support the rural economy by accommodating well-designed, appropriate new forms of development and changes in land use where a countryside location is required and where it does not adversely affect the rural environment.

The Capacity of Mid Sussex District to Accommodate Development Study (June 2014, paragraph 2.138) describes high quality soil as an invaluable and non-renewable natural resource and identifies provisional Agricultural Land Classification Grades across the District which suggest only 455.7 hectares of Grade 2 land (1.4% of the District) and no Grade 1 land within Mid Sussex. A large proportion of the District (63.8%) is Grade 3 land with the potential to be classified as Grade 3a (i.e. best and most versatile agricultural land). Not all land has been surveyed in detail and more detailed field surveys may be required to inform decisions about specific sites. Where identified, Grade 1, 2 and 3a agricultural land should

be protected from development due to its economic importance and geological value. This is the land which is most flexible, productive and efficient and can best deliver future crops for food and non-food uses.

Minerals are a finite resource and can only be worked where they are found. Therefore it is important to use them in the most efficient manner to secure their long term conservation. Where a development is sited in a West Sussex Minerals Consultation Area, further work will be required in conjunction with West Sussex County Council as the Minerals Planning Authority to identify whether minerals are accessible in sufficient amounts to be economically viable to extract.

DPC1: Protection and Enhancement of the Countryside

The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- it is necessary for the purposes of agriculture; or
- it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.

The best and most versatile agricultural land (Grades 1, 2 and 3a) will be protected from non-agricultural development proposals and will be protected from being covered by artificial surfaces that will prevent future use of the soils. Where significant development of any grade of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.

Development proposals should demonstrate they are informed by landscape character. The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the rural and landscape character.

Built-up area boundaries are subject to review by Neighbourhood Plans or through a Development Plan Document produced by the District Council.

Economically viable mineral reserves within the district will be safeguarded.

DPC2: Preventing Coalescence

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	2 – Maintaining Settlement Identity and Character

The settlement pattern of Mid Sussex makes an important contribution to the distinctive character of Mid Sussex and therefore a strategic objective of the Plan is to promote well located and designed development that reflects the distinctive towns and villages, retains their separate identity and character and prevents coalescence.

DPC2: Preventing Coalescence

The individual towns and villages in the District each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.

Provided it is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside, development will be permitted 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.

Local Gaps can be identified in Neighbourhood Plans or a Development Plan Document produced by the District Council, where there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection.

DPC3: New Homes in the Countryside

Policy:	Non - Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 10 – Support Strong and Diverse Rural Economy 13 – Provide Housing to Meet Community Needs

The National Planning Policy Framework is clear that the development of isolated homes should be avoided (paragraph 80). However, it is recognised that exceptional circumstances may exist that justify new homes in the countryside. The policy below provides clear guidance on how proposals for such developments will be considered. It also contains criteria on the re-use of rural buildings and replacement dwellings in the countryside.

DPC3: New Homes in the Countryside

1. New homes in the countryside, defined as areas outside the built-up area boundaries, will be permitted in specific circumstances, as set out below:
 - i. Accommodation is essential to enable the operation of an agricultural, forestry or similar rural enterprises requiring full time rural workers to live at, or near, their place of work;
 - ii. In the case of new isolated homes in the countryside, where the design of the dwelling is of exceptional quality, is truly outstanding and would significantly enhance its immediate setting and is sensitive to the character of the local area;
 - iii. Development would involve the subdivision of an existing residential building;
 - iv. The proposed development meets the requirements of Policy DPH2: Sustainable Development – Outside Built-Up Area;
 - v. The proposed development is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside; or
 - vi. Affordable housing in accordance with Policy DPH38: Rural Exception Sites.

2. Permanent agricultural (includes forestry and similar land-based rural enterprise requiring full time rural workers) dwellings will only be permitted to support existing agricultural activities on well-established agricultural units where:
- i. The need cannot be fulfilled by another existing dwelling on, or any other existing accommodation near to, the agricultural unit; and
 - ii. It can be proven that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times; and
 - iii. It can be proven that the rural enterprise is economically viable. This should include demonstrating that the enterprise has been established continuously for the previous three years and profitable for at least one of them; and
 - iv. It can be proven that the size and location of the dwelling is commensurate with the established functional requirement of the agricultural unit.

Temporary agricultural dwellings essential to support a new rural enterprise either on a newly created agricultural unit or on an established one will be subject to the criteria above and should normally be provided by temporary accommodation.

Applications for the removal of agricultural occupancy conditions will only be permitted where it can be proven that there is no longer any need for the dwelling for someone solely, mainly or last working in agriculture or forestry or other rural based enterprise. This will be based on an up-to-date assessment of the demand for farm (or other occupational) dwellings in the area as a whole, and not just on a particular holding.

New 'granny annexes' that are physically separate to the dwelling are defined as a new home and are subject to the same requirements as above.

3. Re-use of rural buildings for residential use

The re-use and adaptation of rural buildings for residential use in the countryside will be permitted where it is not a recently constructed⁷ agricultural building which has not been or has been little used for its original purpose and:

- i. the re-use would secure the future of a heritage asset; or
- ii. the re-use would lead to an enhancement of the immediate setting and the quality of the rural and landscape character of the area is maintained.

4. Replacement dwellings in the countryside

Replacement dwellings in the countryside will be permitted where:

- i. The residential use has not been abandoned;
- ii. Highway, access and parking requirements can be met;
- iii. The replacement dwelling is of equivalent size, scale and massing and within the same or similar position of the existing dwelling, unless there are demonstrable benefits in relocating the dwelling; and
- iv. The scale, size and massing of the replacement dwelling should maintain or where possible enhance the quality of the natural and/or built landscape, particularly in the High Weald Area of Outstanding Natural Beauty.

New dwellings, including conversions, located within the Ashdown Forest 7km Zone, will be required to comply with Policy DPC6: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

⁷ The term 'recently constructed' will generally be held to apply to buildings constructed within five years of a planning application for their re-use or adaptation.

DPC4: High Weald Area of Outstanding Natural Beauty

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 11 – Support Mid Sussex as a Visitor Destination

An Area of Outstanding Natural Beauty (AONB) is an area of land protected by the Countryside and Rights of Way Act 2000 for its outstanding natural beauty. The purpose of the landscape designation is to conserve and enhance the natural beauty of the area.

The High Weald AONB was designated in 1983. It has an area of 1,461 sq km and covers four counties and 11 districts. Nearly 50% of Mid Sussex District is within the High Weald AONB; there are 163.6 sq km of AONB land within Mid Sussex District which is approximately 11% of the High Weald AONB.

The High Weald AONB is a historic landscape characterised by a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams and woodlands. Small irregularly-shaped and productive fields typically used for livestock grazing are often bounded by hedgerows and woodland. Dispersed historic settlements of farmsteads and late Mediaeval villages are characteristics as are historic routeways.

The High Weald AONB Management Plan is the strategy for looking after the High Weald AONB in order to achieve the statutory purpose of conserving and enhancing the High Weald AONB. The Management Plan can be used to guide environmental land management and assess the impact of development or other changes on the High Weald AONB. The High Weald AONB Statement of Significance sets out what comprises the natural beauty of the High Weald.

DPC4: High Weald Area of Outstanding Natural Beauty

Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;

- the identified landscape features or components of natural beauty and to their setting;
- the traditional interaction of people with the landscape and nature, and appropriate land management;
- the historic landscape, character and local distinctiveness, historic settlement pattern, sense of place and setting of the AONB; and
- the conservation of wildlife and cultural heritage.

Development should demonstrate a positive contribution to the objectives of the High Weald AONB Management Plan and take account of the High Weald Housing Design Guide including applying a landscape-led design approach that reflects High Weald character; using high quality architecture; responding to the historic pattern and character of settlements; and protecting dark skies.

Proposals which support the land-based economy and social well-being of local communities within the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.

Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the landscape character and views into and out of the AONB by virtue of its location or design.

DPC5: Setting of the South Downs National Park

Policy: Strategic
Review Status: No Update
Strategic Objectives: 3 – Protect Valued Landscapes
11 – Support Mid Sussex as a Visitor Destination

The South Downs was established as a National Park in 2010 and over 10% of Mid Sussex District is within the South Downs National Park. The areas of land surrounding the South Downs National Park contribute to the setting of the South Downs National Park.

The statutory purpose for National Parks is set out in the Environment Act 1995. Section 61 provides for the two purposes of National Parks:

- i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- ii) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Mid Sussex District Council works in partnership with the South Downs National Park Authority to conserve and enhance the landscape and scenic beauty of the South Downs National Park.

DPC5: Setting of the South Downs National Park

Development within land that contributes to the setting of the South Downs National Park will only be permitted where it does not detract from, or cause detriment to, the visual and special qualities (including dark skies), tranquillity and essential characteristics of the National Park, and in particular should not adversely affect transitional open green spaces between the site and the boundary of the South Downs National Park, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.

Development should be consistent with National Park purposes and must not significantly harm the National Park or its setting. Assessment of such development proposals will also have regard to the South Downs Partnership Management Plan and South Downs Local Plan and other adopted planning documents and strategies.

DPC6: Ashdown Forest SPA and SAC

Policy: Strategic

Review Status: Minor Update
Strategic Objectives: 3 – Protect Valued Landscapes

The District Council has undertaken a Habitats Regulations Assessment to test whether the District Plan, in combination with other plans and projects, is likely to have an adverse impact on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

The main potential impacts arising from the District Plan that are likely to have a significant effect on Ashdown Forest are recreational disturbance to protected breeding birds from an increase in visitors to Ashdown Forest and atmospheric pollution affecting the heathland habitat from increased traffic and associated nitrogen deposition.

Increased recreational activity arising from new residential development and related population growth is likely to disturb the protected near-ground and ground nesting birds on Ashdown Forest. Mitigation measures are necessary to counteract the effects of potential increasing recreational pressure on the Ashdown Forest SPA arising from new residential development within a 7km zone of influence around the Ashdown Forest SPA. Mitigation measures will help to ensure that the conservation objectives for the Ashdown Forest SPA and SAC are met which will prevent a deterioration of the conservation status of qualifying species for which the SPA has been classified and the qualifying habitats and species for which the SAC has been designated.

There are two parts to the mitigation: Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). The SANG and SAMM mitigation approach set out in Policy DPC6 aligns with the strategic solution for recreational disturbance on the Ashdown Forest SPA which is supported by Natural England. This strategic solution ensures the requirements of the Habitats Regulations are met with regard to the in combination effects of increased recreational pressure on the Ashdown Forest SPA arising from new residential development.

The purpose of SANG is to provide alternative greenspace to attract visitors away from the Ashdown Forest SPA. It aims to reduce overall visitor and recreational pressure on Ashdown Forest, and to provide for the needs of dog walkers in particular. Relevant development will need to either provide a SANG or make a financial contribution to a strategic SANG.

The second part of mitigation is to provide a financial contribution towards a SAMM strategy. This aims to manage visitors on-site at Ashdown Forest. The Joint SAMM Strategy is a strategic co-ordinated approach to mitigation in partnership with Lewes, Sevenoaks, Tandridge and Wealden District Councils, Tunbridge Wells Borough Council, Natural England, and the Conservators of Ashdown Forest. The SAMM Partnership for Ashdown Forest is actively working to deliver access management projects to address issues arising from visitor pressure and undertake monitoring at both Ashdown Forest and the four operational SANG sites.

In terms of atmospheric pollution, no further measures are necessary at this stage, however, all planning applications will need to be assessed to consider any air quality impacts and to prevent adverse effects on the integrity of the Ashdown Forest SAC.

DPC6: Ashdown Forest SPA and SAC

In order to prevent adverse effects on the integrity of the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with

other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

Recreational pressure

Mitigation requirements for recreational pressure impacts will be sought in accordance with the strategic solution for the Ashdown Forest SPA and SAC in force at the time of the application. The zone of influence and mitigation requirements may be subject to revision to take account of new evidence on visitor patterns or monitoring.

Within a 400 metres buffer zone around Ashdown Forest, mitigation measures are unlikely to be capable of protecting the integrity of the SPA and, therefore, residential development will not be permitted.

Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in units will be required to contribute to mitigation through:

- 1) The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to a strategic SANG acceptable to provide mitigation for the development; and
- 2) A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.

Development proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by-case basis and assessed through a site-specific Habitats Regulations Assessment at the application stage.

Air quality

New development likely to result in increased traffic will need to be assessed through a site-specific Habitats Regulations Assessment at the application stage to consider any air quality impacts and to prevent adverse effects on the integrity of the Ashdown Forest SAC.

11. Built Environment



Built Environment	DPB1: Character and Design DPB2: Listed Buildings and Other Heritage Assets DPB3: Conservation Areas
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DPB1: Character and Design

Policy: Review Status: Strategic Objectives:	Strategic Minor Update 1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character 3 – Protect Valued Landscapes 4 – Protected Built and Historic Environment 5 – Create and Maintain Green Infrastructure 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments
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Mid Sussex has a high quality built and natural environment and this requires the design of new development to respect the character of towns and villages as well as the character of the buildings. This policy requires high quality in design with new development that contributes positively to the private and public realm (including streets and open spaces), protects valued townscapes, creates accessible and inclusive environments whilst maximising sustainability opportunities.

In relation to Gatwick Airport, any proposed development would need to comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. For example there may be restrictions on height, on the detailed design of buildings or on development which might create an aircraft ‘bird strike’ hazard.

DPB1: Character and Design

All new development should be of high quality and must respond appropriately to its context, be inclusive and prioritise sustainability. This includes the design and layout of new buildings, alterations to existing buildings and the design of surrounding spaces.

All applicants will be required to demonstrate that development takes the following into account:

Understanding the Context

- i. reflects the distinctive character of the towns and villages and protects their separate identity and valued townscapes;
- ii. is sensitive to the countryside including the topography;

Layout, Streets and Spaces

- iii. includes appropriate landscaping and greenspace;
- iv. contributes positively to, and clearly defines, public and private realms and designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;
- v. incorporates a green infrastructure plan that maximises opportunities to retain existing trees and incorporate new trees (i.e. in parks and community orchards), including delivering tree-lined streets and protects open spaces and gardens that contribute to the character of the area;
- vi. incorporates well integrated parking and servicing areas that do not dominate the street environment, particularly where high density housing is proposed;

Establishing the Structure

- vii. is organised around green transport principles and creates a pedestrian and cyclist -friendly layout that is safe, well connected, legible and accessible;
- viii. optimises the potential of the site to accommodate development especially on brownfield sites and in locations close to facilities or with good public transport links.
- ix. take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (500+ dwellings) schemes will also normally be expected to incorporate a mixed use element;

High Quality Building Design

- x. creates a sense of place while addressing the character and scale of the surrounding buildings and landscape through the consideration of the scheme's design, layout, size, scale, massing and views;
- xi. incorporates sustainable construction principles and is designed for adaptation and future weather events; and

Residential Amenity

- xii. does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policies DPN6, DPN7, DPN8 and DPN9).

Further information and guidance on supporting the delivery of high-quality new development, including design principles, can be found in the Mid Sussex Design Guide

DPB2: Listed Buildings and Other Heritage Assets

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	4 – Protected Built and Historic Environment

The heritage assets of the District include over 1,000 Listed Buildings, 25 Scheduled Ancient Monuments which are identified on the policies map and over 500 sites of archaeological interest which appear on the West Sussex Historic Environment Record. The District also includes many other buildings which, whilst not statutorily listed are of architectural merit or of local historic interest, make a valuable contribution to the character of the area.

In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the District Council will have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

DPB2: Listed Buildings and Other Heritage Assets

Listed Buildings

Development will be required to preserve or enhance listed buildings and their settings. This will be achieved by ensuring that:

- A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;
- Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;
- Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;
- Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself;
- Special regard is given to protecting the setting of a listed building;
- Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.

Other Heritage Assets

Development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Council will seek to preserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

DPB3: Conservation Areas

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	2 – Maintaining Settlement Identity and Character 4 – Protected Built and Historic Environment 11 – Support Mid Sussex as a Visitor Destination

The District Council's 36 conservation areas are protected through national planning legislation but are designated locally. They range from the historic town centre of East Grinstead through to smaller villages and settlements. The key characteristics of each of the conservation areas are described in conservation area character summaries on the Council's website. The Council has also produced more detailed conservation area appraisals and management plans for some conservation areas which assess local character and promote environmental enhancements. The conservation area character appraisals will be reviewed where necessary and the Council will support local groups such as local history societies to undertake this work.

DPB3: Conservation Areas

Development in a conservation area will be required to preserve or enhance its special character, appearance and the range of activities which contribute to it. This will be achieved by ensuring that:

- New buildings and extensions are sensitively designed to reflect the special characteristics and appearance of the area in terms of their scale, density, design and through the use of complementary materials;
- Open spaces, gardens, landscaping and boundary features that contribute to the special character and appearance of the area are protected. Any new landscaping or boundary features are designed to reflect that character;
- Traditional shop fronts that are a key feature of the conservation area are protected. Any alterations to shopfronts in a conservation area will only be permitted where they do not result in the loss of a traditional shopfront and the new design is sympathetic to the character of the existing building and street scene in which it is located;
- Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings are of a design that reflects the special characteristics and appearance of the area;
- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

Development will also protect the setting of the conservation area and in particular views into and out of the area.

New buildings of outstanding or innovative design may be acceptable in conservation areas provided that their impact would not cause material harm to the area.

12. Transport



Transport	DPT1: Placemaking and Connectivity DPT2: Rights of Way and Other Recreational Routes DPT3: Cycling DPT4: Parking and Electric Vehicle Charging Infrastructure DPT5: Off Airport Car Parking
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DPT1: Placemaking and Connectivity

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 8 – Opportunities to Live and Work within Communities 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments 15 – Provide Cultural, Leisure and Sporting Facilities

Strategic objectives of the District Plan form the principles which seek to support sustainable communities which are safe, healthy and inclusive, creating environments that are accessible to all members and encourage opportunities to walk, cycle and ride to common destinations. Paragraph 105 of the National Planning Policy Framework (NPPF) encourages significant growth to be focused on location which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, helping to reduce congestion and emissions, and improve air quality and public health.

The District Plan seeks to deliver development which embodies the principles of a 20-minute neighbourhood which make it easier for people to walk, cycle and use public transport and deliver attractive, well planned places which are designed to be inclusive, safe and equitable for all users. Strategic Objective 6 seeks to ensure that development is accompanied by the necessary infrastructure to support development and the community.

The National Planning Policy Framework requires that development should only be refused on highway grounds where there would be an unacceptable impact on highway safety, or where, *'the residual cumulative (transport) impacts on the road network would be severe'* (Paragraph 111). The Mid Sussex Transport Study has been prepared in consultation with West Sussex County Council (WSCC) in their capacity as the Highway Authority and National Highways (NH) as the Highway Authority for the Strategic Road Network. The Study informs whether the development proposed by the District Plan is practical to deliver in principle; and whether mitigation of any significant impacts arising from the development

on the transport network can be cost effectively mitigated. Any transport mitigation that is required to support development, will be included within the Infrastructure Delivery Plan.

The District Plan is in line with and will be delivered in support of the Vision and Objectives of the West Sussex Transport Plan 2022-2036 (WSTP). The WSTP aims to support development which will assist the transition of the transport network towards a path to net zero carbon by 2050 through mass electrification, reduced use of fossil-fuels and local living. The aspiration of better connected communities, which allow residents to live healthy lifestyles and utilise active, public and shared travel modes, whilst minimising adverse impacts such as air pollution and protecting the quality of life of residents, will be delivered through five thematic strategies in the WSTP:

- Active Travel Strategy
- Shared Transport Strategy
- Rail Strategy
- Access to Gatwick Airport Strategy
- Road Network Strategy

The WSTP seeks to move away from a 'predict and provide' approach which historically has focused on building capacity in the network to cater for forecast traffic growth which has often led to exacerbate other impacts, such as health and well-being and achieving climate change mitigation.

The WSTP sets out how the County Council, working with its strategic partners, intends to address key challenges by improving, maintaining and managing the transport network in the period to 2036. The WSTP also sets out the strategy for guiding future investment in across West Sussex to deliver its vision. It sets a framework to guide decisions on how best to address transport, economic, social and environmental challenges to deliver the plan.

The County Council is also a constituent member of the Sub-national Transport Body, Transport for the South East (TfSE) who are developing a strategy for the South East that sets out a strategy for the transport network up to 2050; the strategy is intended to guide future decisions on strategic transport investment. The District Council acknowledge that travel needs and patterns do not obey county boundaries which highlights the need for a continued commitment for affective partnership working with neighbouring authorities and local transport authorities to help deliver strategic improvements to travel. The County Council acknowledge that partnership working will be necessary with other public, private and third sectors to help deliver their strategy and to affect real change to travel in the south east.

As highlighted by the WSTP, Travel within Mid Sussex is currently dominated by car travel; public transport and active travel modes are not seen as viable options for many journeys, although commuting by rail is relatively high in the towns. The district is experiencing issues of congestion on the road network leading to traffic related air quality issues at Hassocks, with monitoring at other locations in the district such as East Grinstead. Bus services in rural areas are limited and high frequency services in the three main towns is lacking.

In accordance with paragraph 112 of the NPPF, priority should be given first to pedestrian and cycle movements; and second, so far as possible to facilitating access to high quality public transport. Travel networks need to be rebalanced in favour of more sustainable modes with developments focusing on trip reduction and the promotion of active and public transport as genuine alternatives to the private car. Transport considerations need to be fundamental throughout the planning process and not retrofitted and the networks on which people will walk, cycle, and use public transport should be considered before any highway

layout is planned. Developments should embody the 20 minute neighbourhood principles, enabling local living through provision of advanced digital infrastructure and ensuring that the capacity, layout, and design of these sustainable networks meet the needs of local residents so that new communities have a genuine opportunity to embrace more sustainable travel habits from the outset.

All new developments will be required to demonstrate as a first priority, that all sustainable travel interventions have been fully explored and sustainable mitigation maximised. Any residual impacts shall then be assessed and the need for physical highway mitigation explored. Depending on the size and likely transport impact of development, a Transport Statement or Transport Assessment will be submitted alongside planning applications. In line with Government guidance, developers are encouraged to enter into pre-application discussions at an early stage in order to front-load the planning application process and enable early consideration of all the fundamental issues relating to a development.

DPT1: Placemaking and Connectivity

Development shall provide appropriate infrastructure to support the vision and objectives of the West Sussex Transport Plan 2022-2036 and meet the requirements of the NPPF.

To meet these objectives:

- a) Development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network shall provide a Transport Assessment / Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.
- b) Demonstrate how all relevant sustainable travel interventions (for the relevant local network) will be maximised and taken into account in terms of their level of mitigation before considering physical highway infrastructure mitigation.
- c) Development shall integrate relevant requirements of Chapter 4 of the Mid Sussex Design Guide and be designed to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond; before the highway layout is planned.
- d) Create liveable communities which strive to embody the 20 minute neighbourhood concept and deliver attractive, healthy places that have a permeable street network within the site with clearly defined route hierarchies that are safe and designed for all users and supporting desirable opportunities for people to choose not to travel by car.
- e) New streets shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre. .

DPT2: Rights of Way and Other Recreational Routes

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	5 – Create and Maintain Green Infrastructure 15 – Provide Cultural, Leisure and Sporting Facilities

Mid Sussex District benefits from an extensive, albeit fragmented, network of public rights of way totalling around 600km, including footpaths, bridleways, byways and restricted byways.

Two Sustrans national cycle routes cross the District:

- NCN20 (along the A23) London to Brighton via Crawley.
- NCN21 (Worth Way and Forest Way) Crawley to East Sussex via East Grinstead.

Rights of way, Sustrans national cycle routes and other recreational routes can facilitate healthy lifestyles by providing opportunities for sustainable and active travel as well as recreation.

The protection and enhancement of the rights of way network along with other recreational routes, including signage, is important to provide access to the countryside and green infrastructure links.

DPT2: Rights of Way and Other Recreational Routes

Rights of way, Sustrans national cycle routes and recreational routes will be protected 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.

Access to the countryside will be encouraged by:

- Ensuring that (where appropriate) development provides safe and convenient links to rights of way and other recreational routes;
- Supporting the provision of additional routes within and between settlements that contribute to providing a joined up network of routes where possible;
- Where appropriate, encouraging making new or existing rights of way multi-functional to allow for benefits for a range of users. (*Note: 'multi-functional will generally mean able to be used by walkers, cyclists and horse-riders).*

DPT3: Active Travel

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments

Transport is the largest contributor to UK domestic greenhouse gas (GHG) emissions, responsible for 27% in 2019⁸. The past 30 years have seen other sectors GHG emissions decline however transport has remained fairly constant and efficiency improvements to vehicles has been matched by increasing number of journeys. The Government's plan to

⁸ Department for Transport (DfT) Decarbonising Transport – A Better Greener Britain 2021

decarbonise transport in Britain is linked to their commitment for the UK's emissions to be net zero by 2050⁹.

In support of the government's target to achieve net zero carbon by 2050 and reduce emissions associated with car travel, developments need to ensure they provide an environment which makes active travel an easy and attractive choice. Easily accessible, conveniently located, and secure cycle storage, close to the main entrance of a building helps to reduce some of the inconvenience of choosing to cycle. Boosting the number of people in a community choosing to regularly cycle has multiple benefits not only to helping tackle climate change but also improving air quality, reducing congestion and noise pollution on our roads, but also improving health and wellbeing.

Journeys below five miles represented 58% of all private car journeys in 2019 and provide the biggest opportunity for switching to cycling and walking¹⁰. The WSTP Active Travel Strategy encompasses the needs of pedestrians, cyclists, equestrians, persons of reduced mobility and micro-mobility solutions, focusing on the majority of journeys which are short distance to increase the use of active travel modes accessible for all.

DPT3: Active Travel

Development will be required to help remove barriers to active travel and create a healthy environment in which people chose to walk and wheel; facilitated by:

- a) Where appropriate, providing high quality, fit for purpose active travel infrastructure, within the development which links to existing networks and builds on the schemes identified in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP).
- b) Providing appropriate levels of cycle parking facilities (taking account of WSCC Guidance on Parking at New Developments 2020 and subsequent iterations), well designed and laid out to be under cover, secure, conveniently located and easily accessible, close to the main entrance of the premises and in accordance with the guidance in the Mid Sussex Design Guide SPD.

DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities

Paragraph 107 of the NPPF identifies that if setting local parking standards, policies should take account of accessibility, type, mix and use of the development, public transport

⁹ Climate Change Act 2008 (2050 Target Amendment) Order 2019.

¹⁰ DfT Decarbonising Transport A Better Greener Britain 2021

provision, car ownership and the need to ensure adequate provision of spaces charging plug-in and other ultra-low emission vehicles.

Guidance on parking standards are set out in to the West Sussex County Council Guidance on Parking at New Developments (2020) and some Neighbourhood Plans and account will be given to the factors set out in paragraph 107 of the NPPF when considering parking levels in a development.

West Sussex Transport Plan and the Council's Sustainable Economic Strategy (SES) 2022 support increased use of electric vehicles and reduced use of fossil-fuels and provision of the infrastructure to support their use. The Council fully supports recent changes to Building Regulations Schedule 1 Part S and will seek to ensure developments are designed to be able to accommodate the relevant requirements for residential development. Where feasible higher standards for non-residential development in line with Policy DPT4 below, unless or until higher standards are required nationally.

DPT4: Parking and Electric Vehicle Charging Infrastructure

Development will be required to:

- a) Provide adequate and well-integrated car parking, taking account of the guidance in the Mid Sussex Design Guide SPD and the WSCC Guidance on Parking at New Developments¹¹ (2020 and subsequent iterations) along with the accessibility of the site to services and sustainable travel infrastructure, and the type, mix and use of development.
- b) Parking associated with all new residential development shall be laid out to ensure the relevant requirements of Schedule 1 Part S of the Building Regulations regarding Electric Vehicle Charging are met.
- c) All new non-residential buildings with more than 10 associated parking spaces within the site boundary, shall provide a minimum of 2 'Fast' (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 50% of the remaining total number of spaces.

DPT5: Off-Airport Car Parking

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities

Gatwick Airport Limited (GAL) are progressing plans to bring the existing standby runway into routine use. This is known as the Northern Runway Project. As part of this project GAL

¹¹ **West Sussex Guidance on Parking in New Developments:** referenced in respect of the number and type of parking spaces required to support a development and not to Electric Vehicle Charging standards on the basis policy DPT4 requirements exceed those of the WSCC Guidance.

are developing a Sustainable Transport Strategy to facilitate a shift to sustainable transport modes when travelling to and from the airport. As part of this strategy GAL are looking at opportunities to reduce the number of parking spaces per passenger travelling through the airport. Controlling the extent of airport related parking, on and off airport helps encourage the use of alternatives whilst ensuring sufficient parking is available to passengers and staff who have no other option. The most sustainable location for airport related car parking is within the airport boundary.

DPT5: Off-Airport Car Parking

Proposals for additional off-airport car parking facilities or extensions to existing airport related car parking site will not be permitted.

Proposals for the relocation of existing off-airport parking that result in a net increase in parking will not be permitted.

13. Economy



Economy	<p>DPE1: Sustainable Economic Development</p> <p>DPE2: Existing Employment Sites</p> <p>DPE3: Employment Allocations</p> <p>DPE4: Town and Village Centre Development</p> <p>DPE5: Within Town and Village Centre Boundaries</p> <p>DPE6: Development Within Primary Shopping Areas</p> <p>DPE7: Smaller Villages and Neighbourhood Centres</p> <p>DPE8: Sustainable Rural Development and the Rural Economy</p> <p>DPE9: Sustainable Tourism and the Visitor Economy</p>
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DPE1: Sustainable Economic Development

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	<p>1 – Sustainable Development and Adaptation to Climate Change</p> <p>2 – Maintaining Settlement Identity and Character</p>

The District Plan strategy is based on the Council’s aspiration for sustainable economic growth established with a vision to make Mid Sussex a vibrant and attractive place for business and people to thrive. This aspiration will contribute towards enhancing the prosperity of the Gatwick Diamond and Greater Brighton City Region, providing the opportunity for the residents of Mid Sussex to work locally and reduce the need to commute.

The joint Economic Growth Assessment (2020) and subsequent focused update for Mid Sussex (2021) highlights a high degree of economic inter-relationship between Crawley, Horsham and Mid Sussex. Overall economic strength is dependent on ongoing and continued joint-working and effective management of strategic issues across the economic sub-region, particularly with those authorities whose economies are critically interrelated to Mid Sussex. The Council will continue to support the Mid Sussex economy and wider economic sub-region in collaboration with other local authorities and alongside the work of the Coast to Capital Local Enterprise Partnership over the Plan period.

The District Plan reflects the requirements of the National Planning Policy Framework paragraph 82, by setting out a clear economic vision and strategy, identifying strategic sites or setting criteria for supporting local and inward investment to anticipated need whilst

seeking to address potential barriers to investment which might exist, such as inadequate infrastructure. Policy DPE1: Sustainable Economic Development encourages new businesses to the District in order to meet aspirations for economic growth and the wider benefits this would bring.

The Council's Sustainable Economy Strategy (SES) (2022 - 2025) sets out the Council's vision for a vibrant district that is attractive, resilient and innovative that balances well-being, environmental protection and sustainable economic growth. The Strategy and associated Action Plan establish a renewed focus on sustainable growth, enabling the economy to grow whilst reducing carbon emissions. This includes: supporting resource efficient consumption; reducing ecological footprints; improving residential skills and health and well-being; promoting green innovation; creating new jobs; attractive investment; and supporting business formation and growth.

The SES focuses on three themes, each of which is underpinned by strategic objectives and performance measures, linked to the most relevant United Nations Sustainable Development Goals:

People – protecting and creating better employment (particularly in the new and emerging green economies); developing skills; improving pathways to work; and reducing pay inequality.

Place – reducing the Council's carbon emissions; supporting businesses to reduce their carbon emissions and to both recover from the pandemic and to grow; encouraging business start-ups; promoting sustainable business practices; developing digital infrastructure; enhancing biodiversity; providing new homes; creating quality town and village centres which meet local needs; and improving active travel connectivity.

Partnerships – The Council's guiding principles of working in partnership are openness, trust, honesty and mutual respect. The Council will agree and deliver shared goals, based on common values and will maintain regular and effective communication with all our partners.

The SES and Action Plan will support the delivery of Policy DPE1: Sustainable Economic Development; attracting and promoting inward investment, facilitating high value employment development, effective partnership working to secure key supporting infrastructure including rolling out fibre and 5G infrastructure, the revitalisation of the town centres and development of centres of excellence and clusters of specialist industries.

The Economic Growth Assessment Update (December 2021) identifies employment need over the plan period based on demographic data and employment growth projections aligned with forecast housing growth set out in policy DPH1: Housing. The latest growth projections identify no outstanding residual employment need, as there is sufficient committed supply (e.g. planning permissions and allocations) already planned for. There is therefore no requirement to allocate additional employment land within this Plan.

The strategy for achieving sustainable economic prosperity and resilience, taking account of the District's role at a sub-regional level within the north west Sussex economic area will focus on; supporting successful delivery of committed development, helping to secure timely delivery of key supporting infrastructure, encouraging inward investment and providing support for existing businesses.

In order to help address identified skills shortages in the district, and working in partnership with the council, Significant Sites allocated in the plan (DPSCxxxx) will be required to demonstrate how they will contribute to and support local employment and skills development and training.

DPE1: Sustainable Economic Development

Sustainable economic development will be achieved by:

- Ensuring major development proposals (including Significant Sites allocated within this District Plan) demonstrate how they will contribute to addressing identified local skills shortages and support local employment, skills development and training.
- Encouraging high value employment development of appropriate land and premises to meet the needs of 21st century businesses which embody sustainable practices, support a circular economy and the achievement of Carbon Net Zero by 2050;
- Supporting existing businesses, and allowing them room to expand;
- Promoting inward investment opportunities, promotion and expansion of clusters or networks of knowledge and data driven, creative or high technology industries; and
- Seeking the appropriate infrastructure to support business growth – in particular advanced digital infrastructure including fibre.

DPE2: Existing Employment Sites

Policy:	Non- Strategic
Review Status:	Minor Modification (to policy SA34 Site Allocations DPD)
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character

The Council's Sustainable Economic Strategy (SES) (2022) Objective 1 seeks to maintain the high employment rate in Mid Sussex and reduce out-commuting and supports a policy framework to meet this need. District Plan Policy DPE1: Sustainable Economic Development sets out the broad policy position related to delivery of high value employment land, promoting inward investment opportunities, supporting existing businesses and securing necessary infrastructure to support growth in the sector whilst addressing local skills shortages.

The Plan also identifies the need to maintain a range of sites and premises across the district to suit a full spectrum of business needs is vital to achieving the council's vision of; 'A vibrant district that is attractive, resilient and innovative that balances social well-being, environmental protection and sustainable economic growth' (SES 2022). In a district which is under pressure for housing, it is vital to ensure appropriate management of existing employment land.

Policy DPE2 seeks to strike an appropriate balance between ensuring protection of valued employment generating sites, whilst enabling sites which are no longer economically viable for continued employment use to be considered for appropriate alternative uses. Protection, intensification and redevelopment of existing employment sites for continued employment use is therefore prioritised in order to provide varied local employment opportunities, help reduce unnecessary travel and support sustainable and balanced communities. This policy provides a framework to support consistent decision making in relation to proposals for changes to existing employment sites.

The existing employment sites identified by policy DPE2 are located throughout the district and offer a varied portfolio of uses, accommodation and opportunities, which in turn demand different values, all of which help support balanced and sustainable communities which provide both housing and employment opportunities. A number of sites are modest in scale and contain historic uses and older accommodation and may therefore demand lower value rental income but nevertheless remain well used and are affordable. This policy is necessary to prevent the inappropriate loss of employment land motivated by higher value uses such as residential whilst allowing for flexibility in accordance with paragraph 81 of the NPPF, helping to create the conditions in which business can invest, expand and adapt.

In accordance with criteria (i) and (ii) of the policy for proposals involving the loss of employment generating uses, planning applications will need to be accompanied by details of comprehensive marketing and a financial appraisal of the site which demonstrates the continued use of the site for employment is no longer viable. The marketing exercise will need to demonstrate not only the existing site is unviable, but also that any redevelopment for continued and alternative employment use is unviable.

A sequential approach will be applied for development proposals on existing and allocated employment sites identified on the Policies Map. The sequential approach will be to secure employment based redevelopment as a priority, appropriate mixed-use employment second to that and lastly redevelopment for alternative non-employment generating use(s).

DPE2: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

Protection:

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

Development proposals outside the traditional employment use classes (E(g), B2 and B8) for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses, is not viable, through the provision of:

- (i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and

- (ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.

Similarly, support will also be given if it is demonstrated that the continued use of the site, or its development for employment or employment uses causes, or would lead to site-specific, environmental problems, such as noise, pollution or disturbance through traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.

Intensification and redevelopment:

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

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace or where any loss can be fully justified.

Proposals for *alternative uses*, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

Existing Employment Areas – Expansion

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

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

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

DPE3: Employment Allocations

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character

The Economic Growth Assessment Update (December 2021) identifies employment need over the plan period. This is based on demographic data and employment growth projections aligned with forecast housing growth set out in policy DPH1: Housing. The latest growth projections identify no outstanding residual employment need, as there is sufficient committed supply (e.g. planning permissions and allocations) already planned for. Whilst there is potential for a deficit in Light/General industrial, this could be met by supply in Mixed B1 which includes Light/General Industrial uses.

Use	Requirement (ha)	Committed Supply (ha)	Over-Supply / Deficit (ha)
Office - E(g)(i)/(iii)	3.4	4.9	+1.5
Light Industrial - E(g)(iii)	29.6	12.9	-9
General Industrial - B2	-7.7		
Storage and Distribution - B8	1.8	18.9	+17.1
Mixed B1	n/a	7.6	+7.6
TOTAL	27.1	44.3	+17.2

DPE3: Employment Allocations

[This section will be updated in the next version of the Plan (Scrutiny Committee 18th October – Housing sites)]

DPE4: Town and Village Centre Development

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres

Town and Village Centres play an important role in local communities and development will be supported where it enhances their vitality and viability. The Council supports the regeneration and renewal of the three key town centres of Burgess Hill, East Grinstead and Haywards Heath; these town centres provide a range of shops, leisure attractions and other facilities which play a key role in serving each town and the surrounding villages and rural areas. The Mid Sussex Retail Study Update (2022) has however identified vulnerabilities across each of the three key centres that warrant policy protection from out-of-centre competitors to support redevelopment of town centre sites, in addition to efforts to enhance the vitality and viability of the towns.

The districts village centres also have an important range of services and facilities that supply the day-to-day requirements of local residents, neighbouring small villages and the countryside areas surrounding the villages. The Retail Study Update (2022) found that the village centres are performing above national averages and it is important that these and

other smaller centres remain vibrant and successful in order to continue to support their communities, reducing the need to travel and enabling more ‘local living’¹².

In accordance with paragraph 86 of the National Planning Framework and as informed by the Mid Sussex Retail Study Update (2022), Policy DPE4: Town and Village Centre Development defines a hierarchy of the districts town and larger villages. Defining the hierarchy of these centres will assist in supporting development which is proportionate to the status of the centre within the hierarchy and maintains the distinctive character of the centre. The policy also defines the boundary for each of the centres and seeks to support uses which allow them to grow and diversify in order to respond to rapid changes in the retail and leisure industries.

The National Planning Practice Guidance (PPG) sets out that for planning purposes, town centres comprise a location where main town centre uses are concentrated, including city and town centres, district centres and local centres.

Annexe 2 of the National Planning Policy Framework (NPPF) defines a ‘town centre’ as an:

Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Proposals for retail, leisure and office and other ‘main town centre’¹³ uses (as defined by the NPPF) should be in a defined town centre location in accordance with the sequential test for town centre uses. Where planning applications are for main town centre uses proposed on the ‘edge of centre’¹⁴ (as defined by the NPPF), outside the town centre or out of town and are not in accordance with the District Plan or Neighbourhood Plan, the Council will apply a sequential test and require an impact assessment as set out in the NPPF.

When assessing planning applications for retail developments outside a town centre, the Retail Study Update (2022) considers that a local impact threshold of 500m² would continue to be justified as an alternative to the default threshold of 2,500m² identified by the National Planning Policy Framework. The level of detail included within a Retail Impact Assessment should be proportionate to the scale and type of retail floorspace proposed, and should be agreed between the Council and the applicant on a case-by-case basis.

The Retail Study Update (2022) also considered the district’s need for retail and leisure provision. This included quantitative and qualitative assessments of capacity, taking account of population and spending growth across the plan period. Whilst these calculations identified capacity for additional convenience goods floorspace over the plan period, limited

¹² **Local living:** The term is used in the West Sussex Local Transport Plan 2022 and is a similar concept to that of the 20 minute neighbourhood.

¹³ **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)

¹⁴ **Edge of centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

capacity was found for additional comparison goods and leisure floorspace over the plan period.

The convenience floorspace capacity was found to have largely resulted from the strong performance of larger out-of-centre store and was not considered to justify new allocations. Given the relative performance of town centre facilities and the availability of vacant retail floorspace across the districts centre, it was concluded that the need could be met through existing and proposed facilities within the Council’s defined centres.

DPE4: Town and Village Centre Development

Development within a defined Town or Village Centre will be supported where a proposal is proportionate to the status of that centre within the hierarchy as set out in the table below:

Town Centres	Burgess Hill
	East Grinstead
	Haywards Heath
Village Centres	Crawley Down
	Cuckfield
	Hassocks
	Hurstpierpoint
	Lindfield

Town and Village Centre Boundaries

Town and Village Centre Boundaries for each settlement in the hierarchy are defined on the Policies Maps and are illustrated Appendix 2

Sequential Test for Town Centre Uses

A sequential test must be applied to planning applications for main town centre uses that are not in an existing defined Town or Village Centre and are not in accordance with the District Plan and the relevant Neighbourhood Plan. The sequential test will require:

- applications for main town centre uses to be located in town centres; or, if suitable sites are not available,
- in edge of centre locations where the site is accessible and well connected to the town centre; or, if suitable sites are not available,
- at accessible out of centre sites that are well connected to the town centre.

Where an application fails to satisfy the sequential test, or fails to meet other requirements of this policy, it should be refused.

For the purposes of the sequential test, Neighbourhood Centres do not perform the same function as Town and Village Centres. Proposals in Neighbourhoods should reflect their role in meeting the day to day needs of the local community in accordance with policy DPE7.

Local Threshold for Retail Impact Assessments

Planning applications proposing the construction of 500m² 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.

DPE5: Within Town and Village Centre Boundaries

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres

Policy DPE5 supports the development of main town centre uses within defined Town and Village Centres with the primary focus of supporting development that will sustain and enhance the vitality and viability of the centre.

This policy supports flexibility to amalgamate and subdivide existing units in a centre to ensure it can adapt to the changing needs of existing and future occupiers and create high quality premises. In certain circumstances and subject to consideration of heritage impacts, it may be acceptable to allow a proportionate net loss in floorspace to facilitate a proposal, providing all resultant units are of a viable to support an occupier's needs, including staff welfare and storage facilities.

The impact of the trend towards online retail, accelerated by Covid-19 has had an impact on our highstreets and many retailers have gone out of business, leaving commercial spaces vacant whilst another occupant is yet to be found. The effect of vacant premises can blight local town and village centres, harming the overall vitality and viability of the centre; particularly where they remain empty for long periods of time.

Support from the Government for temporary and meanwhile uses has been given through changes to planning legislation and in particular the relaxation of changes of use and the introduction of Classes E and F in the Town and Country Planning (Use Classes) Order 1987 (as amended), together with publishing standard leases for the occupation of redundant town centre properties as part of the Government's 'Meanwhile Project' – www.meanwhile.org.uk

The term 'meanwhile use' refers to the short-term use of temporarily empty shops or spaces until they can be brought back into commercial use. Meanwhile uses are generally for the benefit of the community in the form of meeting spaces, exhibitions, informal training and learning spaces, rehearsal space, pop-up shops, microbrewery and taproom, and cafes.

The benefit of supporting such temporary uses can counter the harmful impact of the unit remaining vacant, providing opportunities to keep the area vibrant whilst the landlord of the building continues to look for a new commercial occupant.

The installation of delivery lockers have the potential assist in supporting linked trips to a centre where they are sensitively installed to ensure they do not restrict accessibility either physically by the structure or by those seeking to use the lockers. Their location in a centre also needs careful consideration of matters including access by sustainable travel modes, security and design.

DPE5: Within Town and Village Centre Boundaries

Within Town and Village Centre Boundaries as defined on the Policies Map, development of 'main town centre uses', as defined by the NPPF, will be supported, having regard to relevant Town Centre Masterplans. Support will also be given for:

- a) The amalgamation or subdivision of units, subject to meeting the requirements of policies DPB2 and DPB3 relating to heritage impacts.
- b) Temporary 'meanwhile' uses where they deliver community benefits, do not harm amenity and do not compromise the future redevelopment of the site.
- c) Delivery lockers where it can be demonstrated that their installation would enhance the vitality and viability of the centre and would not restrict accessibility.

DPE6: Development within Primary Shopping Areas

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres

Within each of the three Town Centres, as required by paragraph 86 of the NPPF and informed by the Mid Sussex Retail Study (2022), a smaller area is defined as the centres 'Primary Shopping Area' (PSA). The NPPF defines PSAs as a '*...defined area where retail development is concentrated*'. The Village Centre Boundaries are attributed to the same policy recognition as the PSA.

Within the PSAs the Council will seek to maintain a predominance of Class E Commercial, Business and Service Uses as defined by the Town and County Planning (Use Classes) Order 1987 (as amended), that would sustain and enhance the vitality and viability of the Centre and would not result in harm to amenity. When determining applications within defined Town and Village Centres, non-town centre uses are those uses falling outside the NPPF definition of 'main town centre uses'.

Policy DPE6 seeks to ensure the Council maintain an element of appropriate control over new developments within the PSAs through the use of conditions. Where appropriate the policy supports the use of additional control over permitted changes of a new development to avoid over concentration of uses which could harm the vitality and viability.

Where a loss of Class E or main town centre use is proposed, any application must be supported by appropriate marketing over a suitable time period. 'Appropriate marketing' is where a use has been prominently marketed for the existing and alternative Class E Uses, with reasonable terms and conditions, certified by an appropriately qualified professional; in some circumstances the Council may require this to be independently verified at the applicant's expense. The time period for marketing will be dependent on-site specific circumstances and in accordance with Government guidance, developers are encouraged to enter into pre-application discussions with the council in order to determine the appropriate parameters. The usual time period is likely to be 12 months of a vacant unit.

DPE6: Development within Primary Shopping Areas

Primary Shopping Areas (PSAs) are defined on the Policies Map and are illustrated at Appendix 2. For Town Centres, this is a smaller area within the Town Centre boundary. For Village Centres, the PSA corresponds with the Village Centre Boundary.

- (1) In order to support thriving Centres in the district, development proposals within defined Primary Shopping Areas, (as shown on the Policies Map), involving the loss of Class E Uses will only be supported where:
- a) a main town centre use is proposed,
 - b) it can be demonstrated that the proposed use will sustain and enhance the vitality and viability of the centre,
 - c) neighbouring amenity is protected,
 - d) an active frontage is maintained at ground floor level, and;
 - e) it does not result in a concentration of uses that harm the vitality and viability of the centre.

Residential uses will be supported at upper storeys. Residential at ground floor level will be resisted unless it can be demonstrated that:

- a) the vitality and viability of the centre is not harmed;
 - a) an attractive and active frontage to the public realm is maintained, and;
 - b) no harm would be caused to the character of the streetscene.
- 2) New developments for retail, food and beverage, and associated services uses (Use Class E(a), (b), (c)) within the Primary Shopping Area will be supported with the implementation of restrictions to maintain the mix of uses as permitted to ensure the vitality and viability of the centre is not harmed.
- 3) The loss of Class E and/or main Town Centre Uses to alternative non-main town centre uses will only be supported where evidence can be provided that demonstrates:
- a) the existing and any alternative Class E use is no longer viable; this must be demonstrated through evidence of vacancy and proactive marketing for an appropriate period of time,
 - b) the proposed use would enhance the vitality and viability of the centre, and;
 - c) it would not result in adverse impacts on neighbouring amenity.

DPE7: Smaller Village and Neighbourhood Centres

Policy:	Non-Strategic
Review Status:	Major Update
Strategic Objectives:	9 – Create and Maintain Town and Village Centres 10 – Support Strong and Diverse Rural Economy

The Plan seeks to support a prosperous rural economy in accordance with paragraph 84 of the National Planning Policy Framework.

The Mid Sussex Retail Study Update (2022) focused on the three town centres and the village centres of Crawley Down, Cuckfield, Hassocks, Hurstpierpoint and Lindfield. However, the district's smaller villages and neighbourhood centres also have an important

role to play for their communities and have a range of services and facilities that supply the day-to-day requirements of local residents, neighbouring small villages and the countryside areas surrounding the villages. Although, people may have to travel further to gain access to some services that are not provided by these smaller centres, it is important that they remain vibrant and successful in order that they can continue to support their local communities and reduce the need for unnecessary travel.

DPE7: Smaller Village and Neighbourhood Centres

Outside of defined Town and Village Centre boundaries:

Smaller villages, neighbourhood centres and parades of five or more¹⁵ main town centre uses should be protected to meet the needs of their own communities and countryside areas, except where the existing use is no longer viable, and the proposed use is appropriate in scale and function, will not result in adverse amenity impacts, or is in accordance with a relevant Neighbourhood Plan.

DPE8: Sustainable Rural Development and the Rural Economy

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	4 – Protected Built and Historic Environment 10 – Support Strong and Diverse Rural Economy

Although Mid Sussex is a rural district, agriculture only accounts for a small proportion of all businesses in district. The rural area supports a large number of diverse businesses that make an important contribution to the rural economy. Rural economic development should be encouraged where it provides good quality long-term employment, helps to improve local skills and services and contributes towards sustaining a high quality environment and well-being of the local community in accordance with policy DPC1: Protection and Enhancement of Countryside.

This policy conforms to the National Planning Policy Framework, where it relates to Supporting a prosperous rural economy (paragraph 84). Small scale enterprises needed for the processing, distribution and local retailing of local produce should be positively supported along with sustainable growth and expansion of other types of business in rural areas this will allow the District's rural economy to grow and will improve the quality of life and environment for rural communities.

This policy will not apply within the High Weald Area of Outstanding Natural Beauty, where a more restrictive policy approach, Policy DPC4: High Weald Area of Outstanding Natural Beauty, will be adopted (National Planning Policy Framework paragraph 174).

DPE8: Sustainable Rural Development and the Rural Economy

¹⁵ **Local neighbourhood parades:** DCLG publication 'Parades to be Proud of' defines local neighbourhood parades as: 'Typically located in the heart of a residential community, urban and rural, often with around 5-10 units, providing walk in convenience shopping and limited local services.'

Provided a development is not in conflict with Policy DPC1: Protection and Enhancement of Countryside and Policy DPC2: Preventing Coalescence, and the rural location (outside the built-up area boundaries on the Policies Maps) of the enterprise is justifiable to support a prosperous rural economy in accordance with national policy in the NPPF:

- 1) new small-scale* economic development, and extensions to existing facilities, including leisure and tourism-related development, within the countryside will be permitted provided:
 - it supports sustainable growth and the vitality of all types of businesses in the rural economy; and
 - it involves conversion of existing buildings and/ or well-designed new buildings, where possible on previously developed sites; and
 - it maintains or where possible enhances the quality of the rural setting.

- 2) diversification of activities on existing farm units and other land-based rural businesses will be permitted provided:
 - they are of a scale which is consistent to the location of the farm holding; and
 - they would not prejudice the agricultural use of a farm unit.

- 3) the re-use and adaptation of agricultural and forestry buildings for business or sustainable rural tourism and leisure use in the countryside will be permitted provided:
 - the building is genuinely redundant for agricultural or forestry use; and
 - it is not a recently constructed** agricultural building which has not been or has been little used for its original purpose;
 - the building is demonstrated to be structurally sound and capable of conversion without substantial reconstruction or extension;
 - the site is served by an existing suitable access to the local road network; and
 - the appearance and setting are not adversely affected;

Development for accessible local services and community facilities will be supported in line with policy DPI6.

* Small scale defined as usually being no more than 350m² of floorspace for converted and/or new build development and/or a total site area of 350m² for change of use of land applications.** Recently constructed is defined as being within the previous five (5) years.

DPE9: Sustainable Tourism and the Visitor Economy

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	7 – Encourage Business and Thriving Local Enterprise
	10 – Support Strong and Diverse Rural Economy
	11 – Support Mid Sussex as a Visitor Destination

Tourism makes an important contribution to the economy of Mid Sussex. The District has world-class gardens, historic houses, picturesque villages, international award-winning vineyards and fine cuisine.

The Bluebell Railway, a privately-owned heritage railway, is an important visitor attraction to Mid Sussex. The Bluebell Railway has restored and operated scheduled steam train services on sections of the former Lewes to East Grinstead line since 1960. In view of the Bluebell Railway's value to the local and regional tourist economy and as a public transport link, the Council has supported the completion of the line to East Grinstead. In the long-term, the Bluebell Railway plans to reinstate the disused branch line westwards from Horsted Keynes (via Ardingly) to a terminus at Haywards Heath. The completion of this section will connect the Bluebell Railway with main line rail services at both East Grinstead and Haywards Heath.

The proposed western extension of the Bluebell Railway from Horsted Keynes to Haywards Heath is considered to be a project of District-wide importance and is fully supported by the Council. This policy therefore safeguards the route of the proposed reinstated railway link between East Grinstead and Haywards Heath railway stations for the Bluebell Railway's operating requirements and passenger facilities, as shown on the Policies Map.

DPE9: Sustainable Tourism and the Visitor Economy

The retention of existing tourism accommodation* and attractions will be supported where it is well located and, if it is outside of the built-up area boundary, it respects the character of the countryside.

Where development proposals are brought forward for the change of use of existing tourism accommodation* and attractions, it will need to be demonstrated that there is no realistic prospect of the continued use of the existing provision. The Council will assess such proposals having regard to the market, economy and supply of tourism accommodation* and attractions at the time of the application. Applicants may need to provide:

- evidence of marketing actively conducted for a reasonable period of time;
- evidence that alternative visitor uses have been fully explored;
- an appraisal indicating that the existing use is no longer viable;
- evidence that the site has not been made deliberately unviable;
- evidence of the suitability of the site to accommodate the alternative visitor use; and
- evidence that the reduction of floorspace or bed spaces in the case of tourism accommodation is the only way of improving the standard of the existing tourist facility.

Development proposals for new tourism accommodation* and attractions, or expansions or improvements to existing tourism accommodation* and attractions, will be supported where it is not in conflict with Policy DPE8: Sustainable Rural Development and the Rural Economy and Policy DPC1: Protection and Enhancement of the Countryside, and where it is demonstrated that:

- It increases the range and/or quality of tourist facilities;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;

- Opportunities are taken to use existing buildings where possible;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

The route of the proposed reinstated Bluebell Railway link between East Grinstead and Haywards Heath railway stations (as shown on the Policies Map) will be safeguarded from any development which could prevent its completion.

In particular, land along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations which will be required to deliver the proposed reinstated railway link and associated facilities for the Bluebell Railway will be safeguarded from development.

* Tourism accommodation includes hotels, guesthouses, bed and breakfast establishments, self-catering accommodation and outdoor accommodation such as caravan sites, camping sites and glamping sites (including yurts, log cabins and pods).

14. Sustainable Communities

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will include policies relating to allocation of Significant Sites]

15. Housing



Housing	<p>DPH1: Housing</p> <p>DPH2: Sustainable Development - Outside BUA</p> <p>DPH3: Sustainable Development - Inside BUA</p> <p>DPH26: Older Persons Housing and Specialist Accommodation</p> <p>DPH29: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH30: Self and Custom Build Housing</p> <p>DPH331: Housing Mix</p> <p>DPH32: Affordable Housing</p> <p>DPH33: First Homes</p> <p>DPH34: Rural Exception Sites</p> <p>DPH35: Dwelling Space Standards</p> <p>DPH36: Accessibility</p>
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DPH1: Housing

[The full draft Revised Plan to be presented to Scrutiny Committee 18th October will include policy DPH1: Housing]

DPH2: Sustainable Development – Outside the Built-up Area

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	<p>12 – Support Safe, Healthy and Inclusive Communities</p> <p>13 – Provide Housing to Meet Community Needs</p>

It is recognised that in order for the villages to continue to grow and thrive, in many cases, it is necessary to expand beyond the existing built-up area boundaries, as defined on Policies Maps. In addition to the allocation of additional for land for housing, there are opportunities for small scale (fewer than 10 dwellings) windfall or unplanned development on the edge of settlements.

DPH2: Sustainable Development – Outside the Built-up Area

Outside defined built-up area boundaries, as defined on the Policies Map, the expansion of settlements will be supported where it meets identified local housing, employment and community needs and:

1. The site is allocated in the District Plan, a Neighbourhood Plan or Development Plan Document or where the proposed development is for fewer than 10 dwellings; and
2. The site is contiguous with an existing built-up area of the settlement, as defined on Policies Maps; and
3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy

The developer will need to satisfy the Council that:

- The proposal does not represent an underdevelopment of the site with regard to Policy DPB1: Character and Design and Mid Sussex Design Guide SPD; or
- A large site is not brought forward in phases that individually meet the threshold but cumulatively does not.

DPH3: Sustainable Development – Inside the Built-up Area

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Most settlements in the District have built-up area boundaries which are defined on Policies Maps. Within these settlements there are opportunities for infilling and redevelopment of land to maximise the potential of these areas to accommodate further development. Such sites provide opportunity for sustainable development, often well located to existing services and public transport networks, reducing both the need to travel and pressure to build on the countryside. Whilst such sites are not normally allocated for development, they are a source of 'unidentified' or 'windfall' sites which make an important contribution to the overall housing land supply.

DPH3: Sustainable Development – Inside the Built-up Area

With defined built-up area boundaries, as defined on Policies Maps, development will be permitted within towns and villages. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale with particular regard to DPB1: Character and Design and Mid Sussex Design Guide SPD (2020).

In 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, there may be an opportunity to deliver a greater concentration of development.

DPH26: Older Persons' Housing and Specialist Accommodation

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

People are living longer and the proportion of older people within the district is growing. With this comes an increase in the number of people with long-term health and mobility problems. The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) sets out that the district is likely to see a significant increase in those aged 65 and over to 2038. It also shows a substantial rise in the number of older people with dementia and mobility problems. In those aged 16 to 64, other disabilities, including impaired mobility, are also projected to increase over the Plan period. The provision of suitable accommodation, including type and tenure, capable of supporting an older population and range of disabilities is therefore important in delivering sustainable, mixed and balanced communities.

Whilst more attention may need to be paid towards matters of design, neighbouring land uses and security, proposals for older persons' housing are considered to usually have a lesser impact on existing communities, for instance through lower vehicle usage levels and reduced parking requirements. For this reason, provided the scheme makes efficient use of land, any site considered appropriate for housing development would be positively considered for such older person accommodation through the decision-making process.

Under this Policy, the loss of such facilities for the redevelopment to alternative uses would be prevented unless the scheme or a replacement scheme was proved to be no longer viable or suitable for its intended use; or that there is an existing duplicate facility in the locality that can accommodate the impact of the loss of the facility; or that a replacement facility will be provided in the locality.

It is acknowledged that some existing older persons' housing and specialist accommodation are relatively small in size, and if such schemes were closed on grounds of the suitability for their intended use, then there might be significant doubt on the viability of redevelopment of the site to another specialist scheme. In such cases, the Council will consider alternative provision such as accessible flats for older people.

DPH26: Older Persons' Housing and Specialist Accommodation

Older Persons' Housing Need

Over the Plan Period there is an estimated need for 1,887 additional dwellings with support or care and 211 additional bedspaces. The need by type identified by the 2021 SHMA is set out below:

Older Persons' housing need to 2038 (2021 SHMA)

Accommodation Type and Tenure		Need (units/ bedspaces)
Housing with Support (<i>retirement living or sheltered housing</i>)	Market	801
	Affordable	15
Housing with Care (<i>extra care</i>)	Market	857
	Affordable	214

Residential Care Bedspaces	n/a	300
Nursing Care Bedspaces	n/a	0 ¹⁶

Site Allocations

[This section will be updated in the next version of the Plan (Scrutiny Committee 18th October – Housing sites)]

New developments

Proposals for new older persons' housing and those with specialist accommodation needs will be supported where the following criteria are met:

- i. The site is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan, or the site is located within or contiguous to the Built-Up Area Boundary, as defined on the Policies Map;
- ii. The site is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network;
- iii. The planning application is accompanied by a Travel Plan which sets out how the proposal would seek to limit the need to travel and how it offers a genuine choice of transport modes for residents, staff and visitors;

Extensions to Older Person's Accommodation and Specialist Housing

Proposals for extensions, upgrades and/or annexes to older person's housing and specialist accommodation will be supported where:

- iv. There is a demonstrable need to support the existing accommodation; and
- v. The design respects the character and appearance of the host building and local area and is sub-servient to the existing building; and
- vi. The cumulative additions are not disproportionate to the original building; and
- vii. It does not result in an unacceptable loss of privacy for existing or neighbouring residents.

Loss of Older Persons' Accommodation and Specialist Housing

The loss of existing specialist forms of accommodation for older people and those with specialist housing needs will not be supported unless it is demonstrated to the Council's satisfaction that:

- viii. There is no longer an identified need for the type of housing;
- ix. Suitable alternative provision is, or will be, provided locally so that there is no net loss; or
- x. The accommodation no longer meets minimum standards required to provide acceptable care and it is not practicable or viable to improve the accommodation to minimum standards or adapt for alternative specialist accommodation.

The housing need for Older People and Specialist Housing Accommodation has been established through the SHMA and is set out above. The provision of older persons' and

¹⁶ The Council's 2021 SHMA shows that there is currently an oversupply of 89 Nursing Care Bedspaces in the district, therefore provision should be focussed on other forms of older persons' accommodation, unless latest evidence indicates otherwise.

specialist accommodation is provided by specialist providers and to some extent is market driven by demand for particular specialist 'products' and the business operations of the providers. The District Plan can facilitate the delivery of specialist accommodation through the allocation of suitable sites, but it will be for the providers to deliver.

Very few sites have been submitted to the call for sites for specialist accommodation that are in sustainable locations that deliver the spatial strategy of the Plan. However, there are a number of sites that will be allocated to meet this need.

DPH29: Gypsies, Travellers and Travelling Showpeople

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The Government has an overarching aim to ensure the fair and equal treatment of Gypsies and Travellers that facilitates their traditional and nomadic way of life whilst respecting the interests of the settled community.

National Planning Policy for Traveller Sites (2015) requires Local Planning Authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople to address the identified accommodation needs of Travellers in their area.

The 2022 Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) considers the accommodation needs of Gypsies, Travellers and Travelling Showpeople and sets out the amount of permanent Gypsy and Traveller accommodation required within the district for the period to 2038. The majority of the identified need, outside the South Downs National Park, is already committed through the saved Northern Arc strategic site allocation; the residual need will be expected to be met by the Significant Site allocations within this Plan.

The GTAA does not indicate a need for further transit provision at this time as there is an operational public transit site in Chichester which serves the need of the West Sussex local authorities. In the event that a proposal comes forward it will be considered against the below criteria, taking into account the short-term nature of transit accommodation. Levels of unauthorised encampments in Mid Sussex by Gypsies, Travellers and Travelling Showpeople will be monitored over the plan period to identify any additional requirement for such provision.

DPH29: Gypsies, Travellers and Travelling Showpeople

The Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2022) identifies a need for 4 net permanent pitches for Gypsies and Travellers who still travel¹⁷ and 12 net permanent pitches for Gypsies and Travellers who no longer travel¹⁸, for the period 2021 to 2038. Part of the 16-pitch need will be met by the delivery of existing commitments¹⁹, as shown in the table below.

Gypsy and Traveller Provision

¹⁷ For Gypsies, Travellers and Travelling Showpeople who meet, or considered may meet, the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

¹⁸ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

¹⁹ Commitments here relate to pitches with planning permission.

Gypsy and Traveller Pitch Provision	No longer travel	Still Travel
Minimum Permanent Pitch Requirement (2021 to 2038)	12	4
Commitments (as at 1 April 2021)	13	0
Total residual requirement	0	4

To ensure that a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs within an appropriate timescale, the Council requires that on-site provision is made on Significant Site allocations to contribute to the overall need.

New and extensions to Gypsy, Traveller and Travelling Showpeople sites

In guiding the allocation of Gypsy, Traveller and Travelling Showpeople sites²⁰ (permanent and transit) and the consideration of planning applications, proposals will be supported provided that:

- i. The site or extension satisfies a clearly defined need, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment, or the best available evidence;
- ii. The site is reasonably accessible to schools, shops, health and other local services and community facilities;
- iii. The site has or will have safe vehicular and pedestrian access to and from the road network and will have adequate provision for parking, turning space, servicing and emergency vehicles;
- iv. The development is appropriately located and designed, or capable of being designed to in the case of outline applications, 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;
- v. The sites are compatible with neighbouring land uses and minimise impacts on adjacent uses, built form and landscape character;
- vi. In rural and semi-rural areas sites should not dominate the nearest settled community;
- vii. Each pitch should be capable of accommodating 1 mobile home, 1 touring caravan, 2 car parking spaces, an amenity building and amenity space;
- viii. Sites for Travelling Showpeople should include adequate space for storage and/ or keeping and exercising any animals associated with Travelling Showpeople's needs;
- ix. Any site within the 7km zone of influence around Ashdown Forest will require an assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required (Policy DPC6: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) refers); and
- x. In the case of proposals within the High Weald AONB, Policy DPC4: High Weald Area of Outstanding Natural Beauty will apply.

²⁰ For Gypsies and Travellers who meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel.

The determination of planning applications for new sites or extensions to sites providing accommodation for settled Gypsy and Traveller and Travelling Showpeople²¹ use will be considered under the relevant District Plan policies.

Existing Gypsy, Traveller and Travelling Showpeople sites

Existing Gypsy and Traveller sites will be safeguarded for Gypsy and Traveller use. Planning permission will not be granted for an alternative use on an existing site unless an alternative, replacement site has been identified and developed to provide facilities of an equivalent or improved standard (including its location) whilst there remains a need for such sites as evidenced by the Gypsy and Traveller Accommodation Assessment, or the best available evidence.

Any new or extensions to existing Gypsy, Traveller or Travelling Showpeople sites²² granted permanent planning permission shall also be safeguarded for such use.

The provision of permanent and suitable accommodation to meet the changing needs of current and future Gypsy, Traveller and Travelling Showpeople households will be monitored to ensure a suitable supply of such sites is provided at the appropriate time.

DPH30: Self and Custom Build Housing

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The Self-Build and Custom Housebuilding Act 2015 requires the Council to keep a register of people who are interested in building their own home. The register is an indication of the demand for this type of housing in the District. Under the Self-Build and Custom Housebuilding Regulations 2016 the Council is required to grant suitable development permissions to meet the demand from Part 1 entries on the register within a three-year period²³.

Self- and custom- build housing can be delivered through a wide range of projects from, a traditional DIY self-build home to projects where the self-builder employs someone to build their home for them or a custom builder provides an element of choice in materials or layout. Community-led projects can also be defined as self-build. It can offer a form of housing which is generally more affordable and complements the supply of mainstream housing.

. To help satisfy potential future demand the Council will look to allocations to deliver a number of serviced plots, and provision on other appropriate non-allocated sites will also be considered.

²¹ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- Planning Policy for Traveller Sites (August 2015)

²² For Gypsies and Travellers who meet and do not meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel.

²³ The three-year period runs from the end of each Base Period (31 October to 30 October)

The provision of self or custom-build plots on a range of development types and sizes will support sustainable communities and offer a variety of opportunities to those who wish to build their own home. By requiring larger residential developments to provide a proportion of plots for self or custom build, it will help secure the delivery of suitable plots to meet current and future demand. Smaller residential developments will also be encouraged to deliver serviced plots, especially in areas where there is a significant demand, dependent on their suitability and viability.

The Council's 30% minimum affordable housing requirement will apply to self- and custom build schemes, but First Homes are not required. Self or custom housing plots must be provided in addition to affordable housing not instead of it.

The self- or custom-build plots will be secured by a legal agreement requiring that they be marked out and services provided, before being made available for sale exclusively to households on the Council's Self and Custom Build Register of Interest for a period of 6 months. If after the 6-month period a plot has not been purchased or reserved, it can be made available on the open market as self- or custom-build. If a plot remains unsold after a period of 12 months, it must either remain on the market as a self or custom build plot or be offered to the Council or an approved Registered Provider, before being built out by the developer.

Planning obligations will need to include a requirement that each self or custom build property must be completed within 3 years of the plot being purchased and any affordable self or custom build must remain affordable in perpetuity; this will be secured via a planning obligation between the appropriate parties and the District Council.

DPH30: Self and Custom Build Housing

The District Council believes that self- and custom-build housing has an important role to play in increasing housing choice in the district, consequently:

- i. Proposals for self- or custom-build housing developments will be supported on suitable sites and subject to compliance with other relevant policies within the District Plan.
- ii. Provision of serviced plots for self- or custom-build housing will be encouraged on all new residential developments, subject to the level of demand for such housing, suitability of the site and viability.
- iii. A minimum of 5% of the residential plots on housing sites comprising of 100 or more dwellings, subject to feasibility and viability, will need to be provided as serviced plots for self- or custom-build housing.
- iv. Serviced plots will need to have a water supply, foul and surface water drainage, telecommunications and an electricity supply available at the plot boundary and legal access to a public highway.
- v. Affordable housing on self or custom build sites will need to be provided through an area of serviced land being made available at nil cost or through individual serviced plots being transferred at nil cost.

- vi. A design code, prepared by the developer and agreed with the District Council, will need to be followed for each site and individual plot passports will also be required.
- vii. Each self- or custom-build plot will need to form a separate phase of the development in order to facilitate the timely submission of a reserved matters planning application by the intended occupant of each plot.
- viii. Communities preparing Neighbourhood Plans will be encouraged to identify suitable sites for self- or custom-build housing plots within their neighbourhood plan area.

The above policy will be monitored and kept under review, having regard to any changes to evidence of demand.

DPH31: Housing Mix

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Providing a suitable mix of housing is essential to supporting sustainable, mixed and balanced communities; this includes delivering the appropriate size and type of housing. This policy seeks to ensure that the right size and mix of housing (including affordable housing) is provided within the district.

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) identifies the greatest change in household projections within the district to 2038 will be from those households without dependent children; accounting for 31.9%. However, there remains a notable increase in households with dependent children; 19.6%. Providing a suitable mix of sized dwellings will offer choice for older households to downsize, more affordable options for younger households looking to get on the housing ladder and support the growing number of family households within the district.

The District Council supports the provision of flexible market housing and specialist accommodation or care appropriate for older persons through both public and private sector provision. Providing suitable and alternative housing for older people can free up houses that are otherwise under occupied.

Older persons' housing and specialist accommodation form a very specific part of the housing needs market. The analysis undertaken within the SHMA shows a notable growth in the population of older persons aged 65 and over within the district to 2038. This in turn is expected to result in an increase in the number of people with long-term health problems or disability, thus requiring suitable accommodation. Policy DPH30: Older Persons' Housing and Specialist Accommodation sets out the estimated need and measures, including allocations, to help address this need.

The District Council also makes policy provision through Policy DPH40: Accessibility to ensure that new residential development provides accessible and adaptable dwellings and

wheelchair-user dwellings to support the changes and needs of individuals and families at different stages of life.

The 2022 Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) identifies the level of need for permanent Gypsy and Traveller accommodation in the district. Policy DPH33: Gypsies, Travellers and Travelling Showpeople identifies the pitch requirement and how the need is to be met.

With regards to other specific types of accommodation, the SHMA looked at the role of Build-to-rent and Co-Living as supplementary forms of housing. Build-to-Rent is purpose built housing that is typically 100% rented. Whilst to date only one Build-to-Rent scheme has come forward within the district, the SHMA notes that the private rented sector accounts for 18% of the district's housing stock in 2011, thereby having a clear role in the market. Co-Living is a modern form of shared housing with communal spaces and amenities often aimed at young professionals who are perhaps more transient. No schemes for co-living have come forward to date; however, with both Built-to-Rent and Co-Living housing the Council will monitor the demand and consider proposals against the relevant District Plan policies.

DPH31: Housing Mix

To support the delivery of sustainable, mixed and balanced communities, housing development will:

- 1) provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs. The Council expects the ranges set out in the below table to be used as a starting point:

Housing Mix split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Market housing	5-10%	20-25%	40-45%	25-30%
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- 2) Variations to the above will be considered where the Council is satisfied that:
 - i. The site characteristics and location dictate that there is a more appropriate mix of size of dwellings;
 - ii. There is an identified need for a particular size of dwelling in the nearest settlement; or
 - iii. There are demonstrable financial viability reasons for doing so.

Other accommodation types

To meet the identified current and future needs of different groups in the community, the Council will seek a range of accommodation types to be delivered on new developments which are of an appropriate size, scale and location. **This could include provision of bungalows and other forms of suitable accommodation, where in accordance with the Mid Sussex Design Guide SPD.**

The types of accommodation include that which is suitable for:

- Older persons (DPH26);
- People with disabilities (DPH40);
- People who wish to build their own home (DPH30);
- Build to Rent;
- Co-Living; and
- Gypsy and Traveller community (DPH29).

Where applicable, specific policies on the different accommodation types are identified against each of the above.

DPH32: Affordable Housing

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) provides the underlying justification for requiring the provision of affordable housing on residential development through affordable housing policies. The SHMA highlights the clear need for both social and affordable rented housing. The net need for affordable home ownership housing is smaller, albeit its provision will support some of those households currently unable to access market housing as they fall within the rent/ buy 'gap' or experience barriers in obtaining a mortgage.

In order to respond to the identified need for affordable housing of different tenures and to help deliver mixed, balanced and sustainable communities, the Council will require the provision of 25% First Homes with the remaining 75% being provided as social or affordable rented homes, on all sites above the Affordable Housing threshold. The Council recognise that this mix does not meet the NPPF expectation that 10% of homes on major developments should be for affordable home ownership; however, it is supported by the SHMA findings which highlights a clear and acute need for rented affordable housing.

In setting affordable housing policies, the evidence of affordable housing need must be combined with other information, including the viability and deliverability of housing development, to set a level of affordable housing that is realistic and deliverable. The 2022 Mid Sussex Local Plan Viability Study applies the likely costs of new housing developments, including affordable housing and other policy requirements such as accessibility and space standards, environmental policies and infrastructure contributions (Section 106).

The requirement for the provision of a minimum of 30% affordable housing applies to all types of residential development. This includes changes of use, mixed use sites that incorporate an element of residential development, sheltered and extra care housing schemes, conversions, built to rent and private rent schemes and any other developments where there is an increase in the number of residential units on the site.

Schemes delivering 100% affordable housing, self or custom build housing, or specialist accommodation (such as older persons' housing) are not required to provide First Homes only dwellings for affordable / social rent. There is also no requirement for First Homes on a rural exception site or on sites providing solely Build to Rent Homes.

Design

Any rented flats are to be provided in separate blocks, around separate cores or on separate floors or with separate access to any First Homes or open market flats, in order to meet Register Provider management and service charge requirements. Lifts must be provided in blocks of flats above 3 stories, and in 3 storey blocks of accommodation designed for the over 55's. No more than 6 x 1 bed flats are to be included in one block unless the scheme is a sheltered housing scheme.

A minimum of 4% of Affordable Housing units (rounded up to the next whole number) on suitable schemes unless agreed with the Council's Housing Enabling Officer, are to be wheelchair-accessible dwellings for rent, built to the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) of schedule 1 of the Building Regulations 2010 as amended. The floor areas of these units should be approximately 20% larger in the case of flats and 30% larger in the case of houses, (as shown in the table below), in order to properly accommodate the requirements.

Dimensions, floor areas, manoeuvring zones and correctly sized furniture layouts, which meet the above requirements are to be clearly indicated on individual unit layouts (at a scale of 1:50). Three A1 sized hard copies of these layouts, and plans showing the associated parking provision, and access from the wheelchair accessible parking spaces to the wheelchair accessible dwellings, must be submitted to and agreed with the Council's housing team before reserved matters / full planning permission is granted. Final agreement of any details will also be required as a condition of planning consent.

Appropriate parking provision is to be provided for all affordable units, in line with that for open market housing. Car parking provision for wheelchair accessible dwellings must comply with the requirements detailed in M4(3) of Schedule 1 of the Building Regulations 2010 as amended.

Securing Affordable Housing Units

Registered Providers delivering the affordable housing are to be approved in writing by the Council, for each development / phase of development. Each Registered Provider must have a local management base, commit to letting their properties through the Mid Sussex Common Housing Register, and be willing to help the Council meet those needs identified as a priority in the district.

Developers are to enter into a non- rescindable contract with a Registered Provider to deliver the affordable units, prior to works commencing on any development or phase of development. This will enable the Registered Provider to oversee all construction works and help ensure the delivery of the affordable housing.

Applicants are to build into their designs at pre application stage, and take into account when negotiating site acquisitions and undertaking development feasibility, the 30% affordable housing required in accordance with the occupancy, size, clustering, tenure and other

requirements detailed here. An affordable housing statement, plan and schedule of accommodation must be provided prior to validation of the planning application, to demonstrate that these requirements will be met.

All categories of affordable housing are to be demonstrably affordable, taking account of local incomes, for those unable to meet their housing needs through the private housing market. Consequently, rents must be capped at a maximum of 80% of market rent, or the Local Housing Allowance Level for the relevant size of unit whichever is lower, unless they are social rents determined through the Government's rent policy.

All requirements for the provision of affordable housing, including the need for any subsidy to be recycled for alternative affordable housing provision, are to be built into and secured through an appropriate planning obligation. This must include the requirement for developments where the floorspace is not yet known but may exceed the threshold to provide the necessary affordable housing in such instances.

All affordable housing will require the Council's standard legal nomination agreement between the District Council and the Registered Provider, to be completed prior to occupation. This will enable the District Council to control the occupancy of the new affordable housing, and to ensure that it continues to be available to meet local housing needs in perpetuity. Occupancy criteria and nomination arrangements for both initial and future lettings, assignments and disposals will be detailed. Applicants will be nominated from the District Council's Common Housing Register, and in accordance with the Council's allocations scheme, and 100% nomination rights will be required in perpetuity.

DPH32: Affordable Housing

Delivering the amount and type of housing which meets the needs of all sectors of the community is a key objective of the District Plan. Consequently, the Council requires:

- i. a minimum of 30% on-site affordable housing, with the number of units rounded up to the next whole number, on all residential and mixed-use developments providing 10 dwellings or more, or with a maximum combined gross floorspace of greater than 1,000m²;
- ii. the full 30% affordable housing requirement to be provided on each and every phase of a phased development, and for the affordable housing to be fully integrated within the development;
- iii. developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 9 dwellings, but with a maximum combined gross floorspace of less than 1,000m², to provide a commuted payment towards off-site provision equivalent to providing 30% on-site affordable housing;
- iv. in the case of redevelopment, at least the same number of affordable homes to be re-provided in accordance with current mix and tenure requirements, on sites where the most recent use included affordable housing;
- v. a mix of affordable housing tenure comprising 25% First Homes and 75% social or affordable rented, unless the best available evidence supports a different mix;

- vi. Unless otherwise agreed with the Council the tenure, type and size split on each site to be as shown in the table below. The majority of 2-bed/ 4 person units should be provided as houses rather than flats, wherever possible.

Affordable housing split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+ bed / 6 person
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- vii. A minimum of 4% of affordable housing units (rounded up to the next whole number) on all suitable schemes, unless otherwise agreed with the Council's Housing Enabling Officer, to be wheelchair accessible dwellings for rent, built to the requirements contained in Part M4(3)(1) (a) and (b) and Part M4(3)(2)(b) of schedule 1 of the Building Regulations 2010 as amended;
- viii. fully serviced land to be provided for the construction of the requisite number of affordable homes at nil cost, and for the affordable properties to be transferred to a Registered Provider at a price which reflects a nil land value and nil public subsidy;
- ix. affordable housing units to meet the occupational and minimum floor area requirements in the table below, or any other increased standard which supersedes these, since the units are likely to be fully occupied;

Minimum floor area standards

No. of Beds	No. of Persons	Minimum floor area - 1 storey (excluding staircases and hallways in the case of duplex flats/ coach houses/FOGs)	Minimum floor area - 2 storey	Minimum floor area - 3 storey	Minimum floor area - Wheelchair Accessible dwelling
1	2	50m ² / 538ft ²	58m ² / 624ft ²	-	60m ² / 646ft ² (1B/2PF)
2	4	70m ² / 753ft ²	79m ² / 850ft ²	-	84m ² / 904ft ² (2B/4PF) 103m ² / 1109ft ² (2B/4PH)
3	5	-	93m ² / 1001ft ²	99m ² / 1066ft ²	121m ² / 1302ft ² (3B/5PH)
3	6	-	102m ² / 1098ft ²	108m ² / 1163ft ²	133m ² / 1432ft ² (3B/6PH)
4	6	-	106m ² / 1141ft ²	112m ² / 1206ft ²	138m ² / 1485ft ² (4B/6PH)

- x. all affordable housing units to be fully integrated into the scheme layout, and provided in clusters of no more than 10 units with open market units in between each cluster, (a couple of extra units may be allowed in clusters which include flats), in order to create more balanced communities;
- xi. affordable housing units to be 'tenure blind' so that affordable and private homes are indistinguishable from one another, in terms of design, build quality, appearance, materials and site location.

Proposals which do not provide a minimum of 30% affordable housing will be refused, unless clear evidence demonstrates, to the Council's satisfaction, that the site cannot viably support the required number of affordable housing units. The Council's approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7), but it should be noted that the submitted viability appraisal must be based on a policy compliant scheme, including 30% Affordable Housing. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. A viability review will also be required later in the project, for all schemes which are not policy compliant. At the review stage more accurate information about build costs and sales values, will be able to be provided for assessment.

Financial contributions, in place of on-site affordable housing, will only be agreed where there are exceptional reasons preventing the provision of on-site affordable housing.

These include where:

- there are prohibitively high service charges;
- schemes comprise less than 6 units;
- the development comprises a single block retirement scheme; or
- the Council wishes to use such funding to develop its own housing.

In such cases a financial contribution payable prior to works commencing and reflecting the full cost of providing alternative serviced land for the required number of units (rounded up if the resultant number is not a whole number), will be sought. The amount per unit will depend on the size, location and type of affordable housing required to be provided by the scheme. The contribution and attached provisions will be detailed in a planning obligation.

Development proposals will be expected to optimise the use of land, and any proposal which appears to have an artificially low density, in order to avoid the required thresholds for affordable housing, or reduce the amount of affordable housing to be provided, may be refused planning permission. Sites must also not be deliberately sub-divided in order to avoid the required affordable housing threshold being met or to reduce the amount of affordable housing required.

The above policy will be monitored and kept under review, having regard to the Council's Housing Strategy and any changes to evidence of housing needs.

DPH33: First Homes

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

First Homes are a form of discounted market sale housing designed to allow people to get on to the housing ladder in their local area. On 24th May 2021, the Government announced its position on First Homes through a Written Ministerial Statement (WMS) and amended Planning Practice Guidance (PPG). Specific qualifying and eligibility criteria and requirements for First Homes are set out in the WMS and PPG.

First homes should seek to meet the needs of the local area and communities within it and Local Connection Criteria will be required to be met by purchasers. If after 3 months actively marketing the property, and a period of 3 months from the date of practical completion, a qualifying household has not reserved or bought the First Home the local connection criteria will be removed and the First Home made available to other eligible buyers. If there is no sale after a further 3 months the First Home can be switched to a normal market sale home but the discounted amount must be paid back to the Council.

All restrictions including discounts, eligibility and local connection criteria will be secured through the s106 agreement. Although the discount must remain at the same level on each subsequent sale, the price cap will only apply to the initial sale.

As with Rural Exception sites, First Homes Exception Sites are small sites which can come forward on non-allocated land, outside the built-up area boundaries, in order to deliver affordable housing. They cannot however come forward in designated rural areas as defined in Annex 2 of the NPPF, where rural exception sites are the sole permissible type of exception site. They must also meet a need which is not already being met elsewhere within the district through developer contributions.

Where it can be clearly demonstrated through evidence that, from a viability perspective, a First Homes Exception Site cannot support a scheme comprising 100% First Homes, the District Council will consider an element of open market housing and/or self-build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme. Details of the evidence required to justify an element of market and/or self-build housing is set out in the Viability Policy. Other forms of affordable housing may also be included where there is a demonstrable significant local need.

The 2021 Strategic Housing Market Assessment (SHMA) considers the role of First Homes and its potential contribution to delivering affordable housing in the district. Following an appraisal of house prices and incomes within the district, it concludes that within Mid Sussex First Homes could deliver 1- and 2-bedroom homes, when the minimum criteria are applied. This provision of smaller, affordable housing is considered to play an important role in helping people access their own home.

Schemes delivering 100% affordable housing, self or custom build housing, or specialist accommodation (such as older persons' housing) are not required to provide First Homes only dwellings for affordable / social rent. There is also no requirement for First Homes on a rural exception site or on sites providing solely Build to Rent Homes

DPH33: First Homes

First Homes are part of the Government's policy to promote home ownership and can be delivered through developer contributions and First Homes Exception sites.

First Homes will be supported by the District Council as part of the affordable housing requirement (DPH36), subject to the following criteria:

- i. First Homes must form 25% of the total number of affordable units on a site even where more than 30% affordable housing is being provided;
- ii. The dwellings are discounted by a minimum of 30% against the market value;
- iii. After the discount has been applied, the first sale of the home is priced no higher than £250,000;
- iv. The purchaser meets the First Homes eligibility criteria; and

- v. The local connection criteria are met by the purchaser.

In order to meet the Local Connection Criteria the purchaser must:

1. be ordinarily resident within the Mid Sussex District Council's administrative area and have been for a continuous period of not less than 12 consecutive months prior to exchange of contracts for the relevant First Home; and/or
2. have a close family association with the Mid Sussex District Council's administrative area by reason of a parent or child who is ordinarily resident within the Mid Sussex District Council's administrative area.

Or meet such other local connection criteria as may be published by the District Council from time to time as its "First Homes Local Connection Criteria" and which is in operation at the time of the relevant disposal of the First Home.

First Homes Exception Sites

The District Council will support First Homes Exception Sites provided that the following additional criteria are met:

- vi. The proposals are wholly or primarily for First Homes;
- vii. There is an identified local need for First Homes which is not already being met elsewhere in the district;
- viii. The development is located adjacent to an existing settlement containing key local services, including a local convenience shop, access to a bus stop with adequate services, and, if possible, a primary school;
- ix. The proposal is proportionate in size and scale to the existing settlement and respects its setting; and
- x. The site is not located within a designated rural area²⁴.

All affordable homes delivered as First Homes in the above circumstances will be secured through a S106 agreement to ensure that the discount and relevant eligibility and local connection criteria remain in perpetuity.

Neighbourhood Plans may apply their own First Homes eligibility criteria, including an increased minimum discount and lower price and income caps in line with national guidance. Alterations to the criteria or requirements must however be evidence based and not impede the delivery of homes.

DPH34: Rural Exception Sites

Policy:	Non - Strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Rural Exception Sites are sites used for affordable housing for local people in perpetuity, which would not normally be granted permission for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either

²⁴ National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985 (Annex 2, NPPF)

current or recent residents or have a current employment or close family connection to the Parish.

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) reviewed the issue of rural housing within the district. The SHMA highlights the role of the Sussex Community Housing Hub and Action in Rural Sussex in delivering rural exception sites, with the support of the Council. The Council will continue to support the work of these groups, as well as work with parishes to identify sites specifically for affordable housing that will meet local needs.

Rural Exception Sites are different to First Homes Exception Sites which are covered under Policy DPH36: First Homes.

DPH34: Rural Exception Sites

The development of rural exception sites for affordable housing will be permitted provided that:

- i. the development comprises 100% affordable housing;
- ii. the housing is to meet the needs of current or recent residents of the Parish or those with a current employment or close family connection to the Parish;
- iii. The size of properties is justified by a Parish Housing Needs Survey carried out in the last 5 years;
- iv. The occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing;
- v. The scale of the development respects the setting, form and character of the settlement and surrounding landscape; and
- vi. 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.

Where it can be clearly demonstrated through evidence that, from a viability perspective, the site cannot support a scheme comprising 100% affordable housing, the District Council will consider an element of open market and/ or self or custom- build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme, provided that:

- The requirements of ii), iii), v) and vi) can be met for the overall scheme and for the affordable housing element i) and iv) can be met; and
- The new development physically integrates the open market and affordable housing, which should seek to be 'tenure blind' and makes best use of the land.

Details of the evidence required to justify an element of open market and/ or self or custom- build housing is set out in the Council's Viability Policy (see Policy DPI7).

The delivery of rural exception sites should be led by Parish Councils, through planning applications, Community Right to Build schemes, Neighbourhood Development Orders or through Neighbourhood Plans and sites must be brought forward in partnership with the relevant Parish Council, a specialist rural Registered Provider and the Council's Planning and Housing Enabling Team.

DPH35: Dwelling Space Standards

Policy:	Non-strategic
Review Status:	No Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The purpose of this policy is to set minimum space standards for all dwellings to ensure that the floor area of new homes and associated storage space is sufficient in size to secure a satisfactory standard of accommodation for their residents.

Dwelling space standards ensure that all residential development in Mid Sussex is of an acceptable size for the wellbeing of future occupants, that there is appropriate circulation space and that homes are highly functional in terms of typical day to day needs. The dwelling space standards help to achieve sustainable development, encouraging useable and flexible living environments in which residents can undertake a range of activities such as bringing up families, working from home and communal and social activities.

DPH35: Dwelling Space Standards

Minimum nationally described space standards, see Glossary, for internal floor space and storage space will be applied to all new residential development.

These standards are applicable to:

- Open market dwellings and affordable housing (see DPH32: Affordable Housing for the occupancy and minimum floor area requirements for Affordable Housing);
- The full range of dwelling types; and
- Dwellings created through subdivision or conversion.

All dwellings will be required to meet these standards, or subsequent improved standards, other than in exceptional circumstances where clear evidence will need to be provided to show that the internal form or special features prevent some of the requirements being met.

DPH36: Accessibility

Policy:	Non-strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs 14 – Create Accessible Environments

Accessibility is about the ease and convenience with which a place can be used by people. This policy applies to both homes and places, including areas of open space and transport.

Dwelling space standards ensure that all residential development in Mid Sussex is of an acceptable size for the wellbeing of future occupants, that there is appropriate circulation space and that homes are highly functional in terms of typical day to day needs. The space standard helps to achieve sustainable development, encouraging useable and flexible living environments in which residents can undertake a range of activities such as bringing up families, working from home and communal and social activities, as well as providing for residents' changing needs by taking into account the spatial implications of providing improved accessibility and adaptability, particularly for older or less mobile people, including meeting the requirements of residential building accessibility standards in Building Regulations Approved Document M (Volume 1)²⁵.

The 2021 Mid Sussex Strategic Housing Market Area Assessment (SHMA) states that by 2038 the number of people over the age of 65 within the district is projected to increase by 43.5%. An older population is also likely to mean that there are more people with associated mobility problems. Whilst an ageing population is the main contributor to the increased need for wheelchair accessible homes the SHMA notes a rise in wheelchair user households aged under 60. The evidence indicates that there is also a disparity between wheelchair users and tenure, indicating a higher need for wheelchair accessible homes for those in affordable housing accommodation. Whilst the SHMA supports a target of 12% of new affordable homes to be wheelchair accessible, this policy seeks 4%. The lower figure is aligned with the Council's experience in successfully securing this level of provision and the level of need indicated by the housing register.

Providing homes which are built to at least Category 2 M4(2) accessible and adaptable standards will help ensure that homes are suitable and capable of meeting a household's changing needs. It is more practical and cost-effective if homes are built to these standards rather than retrofitting necessary alterations, if this is even possible. Therefore, the policy requires that all new homes are built to at least Category 2 (M4(2)) adaptable and accessible standards. It also requires that a proportion of affordable homes are built to Category 3 (M4(3)(2)(b)) wheelchair user standards.

DPH36: Accessibility

All development will be required to meet and maintain high standards of accessibility so that all users can use them safely and easily.

This will apply to all development, including changes of use, refurbishments and extensions, open spaces, the public realm and transport infrastructure, and will need to be demonstrated by the applicant.

With regard to listed buildings, meeting standards of accessibility should ensure that the impact on the integrity of the building is minimised.

Category 2 - Accessible and Adaptable Dwellings

²⁵ Schedule 1 of the Building Regulations 2010, as amended

All residential developments will be expected to meet Category 2 – accessible and adaptable dwellings under Building Regulations – Approved Document M Requirement M4(2), with the following exceptions:

- i. Where new dwellings are created by a change of use;
- ii. Where the scheme is for flatted residential buildings of fewer than 10 dwellings;
- iii. Where specific factors such as site topography make such standards unachievable by practicable and/ or viable means;

Category 3 - Wheelchair-User Dwellings

- Category 3 – Wheelchair-user dwellings under Building Regulations – Approved Document M Requirement M4(3)(2)(a) adaptable will be required for a minimum of 5% of market homes, dependent on the suitability of the site and the need at the time.
- Where affordable housing is required, a minimum of 4% of the affordable housing units (rounded up to the next whole number), on all suitable schemes, unless otherwise agreed with the Council's Housing Enabling Officer, will be required to be wheelchair accessible dwellings (M4(3)(2)(b)) for rent.

The Requirement will also apply to private extra care, assisted living or other such schemes designed for frailer older people or others with disabilities and those in need of care or support services.

16. Infrastructure



Infrastructure	DPI1: Securing Infrastructure 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
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DPI1: Securing Infrastructure

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities

The delivery of the right levels and type of infrastructure is essential to support new homes, economic growth and the creation of sustainable communities. A strategic objective of the District Plan is to ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This ensures that development is adequately served without overstressing existing infrastructure and putting an unacceptable strain on the environment.

An Infrastructure Delivery Plan has been prepared to identify what infrastructure provision is needed and where and when it needs to be delivered in order to support the development and anticipated future growth identified in this Plan.

DPI1: Securing Infrastructure

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure and/or mitigation measures to meet the additional need arising from the proposal. Both on-site and off-site provision, including beyond the district boundary, may be required to address the impacts of development, including cumulative effects on the existing infrastructure.

Existing infrastructure services and facilities will be protected where they contribute to the needs of local communities, unless an equivalent replacement or improvement is provided or there is sufficient alternative provision of the same type in the area, and subject to requirements set out elsewhere in the Plan.

Infrastructure should be provided at the appropriate time, prior to the development becoming operational or being occupied. Applicants will be expected to have early engagement with infrastructure providers to ensure any necessary works can be undertaken in a timely manner. Larger developments may need to be phased to ensure that this requirement can be met.

Where a proposal would be made unviable in light of the infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided for consideration. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. The Council's approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7).

The design and layout of a development should ensure future access to utility infrastructure for maintenance and upgrading.

Proposals by service providers for the delivery of utility infrastructure required to meet the needs generated by new development in the District and by existing communities will be encouraged and permitted, subject to accordance with other policies within the Plan.

Infrastructure will need to be planned and delivered to ensure its future resilience against the impacts of climate change.

DPI2: Planning Obligations

Policy: Strategic
Review Status: New Policy
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Planning obligations will be used by the District Council to secure infrastructure in line with the statutory tests set out in the Community Infrastructure Levy Regulations 2010 (as amended) and national planning policy.

Planning obligations will only be sought where the following tests are met:

- i) Necessary to make the development acceptable in planning terms;
- ii) Directly related to the development; and
- iii) Fairly and reasonably related in scale and kind to the development.

An Infrastructure Delivery Plan has been prepared to identify what infrastructure provision is needed and where and when it needs to be delivered in order to support the development and anticipated future growth identified in this Plan.

DPI2: Planning Obligations

Where required, the Council will use planning obligations to address the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended). This may include but is not limited to the planning obligations set out in the figure below.

Other planning obligations may be sought to secure policy requirements set out in this plan and to mitigate the specific impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended).

Appendix 3 sets out the infrastructure quantity and accessibility standards and formulae used to calculate contributions. The infrastructure standards may be reviewed and will be set following assessments of need and viability. Contributions will be subject to inflation reviews to ensure the necessary infrastructure can be delivered.

Where a planning obligation (which may also be known as a Section 106 Agreement or Unilateral Undertaking) is entered into, the Council and the County Council will secure fees associated with the monitoring of any planning obligations in addition to the Council's legal costs in drafting and completing the agreement. The current applicable fees to be levied will be shown on the Council's website.

DPI3: Major Infrastructure Projects

Policy: Strategic
Review Status: New Policy
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Policy DPI3: Major Infrastructure Projects sets out the approach that the Council will take in responding to major infrastructure applications either as determining authority or as a statutory consultee.

For the purposes of the District Plan, Major Infrastructure Projects (MIP's) are those infrastructure projects that would require Environmental Impact Assessment (EIA) as set out in Schedules 1 and 2 of the EIA Regulations 1999 (except predominantly residential schemes), and include those defined as Nationally Significant Infrastructure Projects (NSIP's).

The Planning Inspectorate is responsible for operating the planning process for NSIP's. Such projects require a type of consent known as 'development consent'. Development consent, where granted, is made by a Development Consent Order (DCO).

National Planning Statements (NPS) set out national case in principle for NSIP's and provide a national policy framework for the consideration of proposals by the Planning Inspectorate, with the final decision being made by Secretary of State. NPS are not part of the statutory development plan, local planning authorities will need to have regard to these when preparing local plans.

The Council has an important role as a statutory consultee in relation to NSIP applications, where there is the potential for the District to be affected by an NSIP proposal.

DPI3: Major Infrastructure Projects

In responding to major infrastructure proposals as a consultee or decision maker the Council will consider applications against the relevant national planning policy and the strategy and relevant policies of the development plan. The objective from the Council's perspective is that such proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan.

However, the Council will seek to adopt an approach which is consistent with relevant NPS and take into account operational requirements of the MIP.

For a NSIP the Council will take into account through the preparation of a Local Impact report, how proposals through their formulation and implementation, avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible. Where the Council is the decision maker, these matters will be taken into account through the planning application process. In all cases the Council will also assess where appropriate how the consideration of alternatives has informed the proposals.

The Council will consider the benefits and impacts of a proposal having regard to direct, indirect secondary and cumulative benefits and impacts, and benefits and impact interactions. This assessment will include the construction, operation and decommissioning (including restoration) stages of the project. It will also have regard to reasonably foreseeable development proposals in the local area, including other infrastructure projects and employment and residential development.

Depending upon the scale and nature of the proposals, in order to present sufficient information for the Council to undertake the assessment, it may request the preparation of Delivery Plans.

Delivery Plans will identifying measures to be taken to maximise benefits, to avoid and minimise impacts, and to mitigate and compensate for impacts, with respect to matters such as the economy, climate change, sustainability, the environment, biodiversity net gain, transport and movement, housing, local communities (including safety, health, leisure and general well-being) council services, and education where this is justified by reference to national policy.

The Management or Delivery plans should identify the systems and resources that will be used to implement the proposed measures.

DPI4: Communications Infrastructure

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 7 – Encourage Business and Thriving Local Enterprise 8 – Opportunities to Live and Work within Communities

High quality advanced digital and communications infrastructure is important for economic growth and social well-being. Digital connectivity is crucial for attracting businesses and for successful business locations. Digital connectivity also has social benefits facilitating social inclusion and providing opportunities to access employment, education and services.

However, the environment also needs to be protected and digital and communications infrastructure should take into account the visual amenity, character and appearance of a local area and should not have an unacceptable impact on sensitive areas.

One of the actions in the Sustainable Economy Strategy 2022-205 is for the Council to facilitate the delivery and use of advanced digital infrastructure (full fibre, wireless network

technology and other digital technologies) to support citizens, public services, existing and new economic activity within Mid Sussex.

Digital connectivity is also a way to implement the 20-minute neighbourhood, particularly in rural areas, and it will contribute to the features of sustainable communities.

DPI4: Communications Infrastructure

The Council will encourage the incorporation of high quality advanced digital infrastructure including fibre to new housing, employment and retail developments.

The expansion of the electronic communications network and digital infrastructure to the towns and rural areas of the District will be supported.

When considering proposals for new telecommunications equipment the following criteria will be taken into account:

- The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. On buildings, apparatus and associated structures should be located and designed in order to seek to minimise impact to the external appearance of the host building;
- New telecommunications equipment should not have an unacceptable effect on sensitive areas, including areas of ecological interest, areas of landscape importance, Areas of Outstanding Natural Beauty, the South Downs National Park, archaeological sites, conservation areas or buildings of architectural or historic interest and should be sensitively designed and sited to avoid damage to the local landscape character;
- Preference will be for use to be made of existing sites rather than the provision of new sites.

When considering applications for telecommunications development, regard will be given to the operational requirements of telecommunications networks and the technical limitations of the technology.

DPI5: Open Space, Sport and Recreational Facilities

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 15 – Provide Cultural, Leisure and Sporting Facilities

Open space, leisure, sport and recreational facilities are important to support healthy lifestyles and should be retained where possible and provided alongside new development.

The facilities referred to in this policy include:

- Allotments, community growing spaces and community orchards
- Artificial turf and grass playing pitches and ancillary facilities
- Gyms, sports halls, swimming pools and fitness facilities
- Kickabout, skate parks, cycling and BMX tracks
- Leisure facilities such as bowling, ice rinks and outdoor activities

- Open space, amenity green space, parks and recreation grounds, natural green space, and nature conservation sites
- Play areas
- Tennis, netball and multi-use courts

It is important to note that open space, leisure, sport and recreational facilities often form part of the green infrastructure for an area and development proposals should also have regard to Policy DPN3: Green Infrastructure.

DPI5: Open Space, Sport and Recreational Facilities

Development that provides new and/or enhanced open space, leisure, sport and recreational facilities, including allotments, to support healthy lifestyles and in accordance with the strategic aims of the Playing Pitch Study, Play & Amenity Green Space Study and Community Buildings Study (or as the studies are updated) will be supported.

The provision of new open space, leisure, sport and recreational facilities, including the provision of public open space, play areas and equipment, will be required for all new residential developments in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. On-site provision will be required where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities. The design of open space and public realm should accord with the Design Guide SPD.

Sites for appropriate open space, leisure, sport and recreational facilities to meet local needs will be identified through Neighbourhood Plans or a Development Plan Document produced by the District Council.

Proposals that involve the loss of open space, leisure, sports and recreational buildings and land, including playing fields, will not be supported unless:

- an assessment has been undertaken which has clearly shown the open space, leisure, sports or recreational land or building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Whilst a site may be surplus to requirements for open space, leisure, sport and recreation use, it may still be of environmental, social or cultural value. The site's development may have unacceptable visual or amenity impact, or adversely affect its wider healthy lifestyles, green infrastructure or biodiversity functions, including for climate change mitigation and resilience. Applicants will therefore need to carefully consider such as proposal alongside other policies in this Plan.

DPI6: Community and Cultural Facilities and Local Services

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities

Community and cultural facilities and local services are important and should be retained where possible and provided alongside new development.

The community facilities and local services referred to in this policy include:

- Activity halls and community centres
- Car parks
- Cemeteries and burial grounds
- Cultural venues such as theatres, performance spaces, cinemas, art centres, galleries and museums
- Education facilities
- Emergency services
- Healthcare facilities
- Libraries
- Local shops including banks and post offices
- Places of worship and church halls
- Public conveniences
- Public houses
- Sports club houses and pavilions
- Parish, village and town halls

DPI6: Community and Cultural Facilities and Local Services

The provision or improvement of community and cultural facilities and local services that contribute to creating sustainable communities will be supported where the proposal is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside and where:

- The need for the community or cultural facility or local service is clearly demonstrated;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

Proposals that involve the loss of a community or cultural facility (including those facilities and services where the loss would reduce the community's ability to meet its day-to-day needs locally), will not be supported unless:

- an assessment has been undertaken which has clearly shown the community or cultural facility or local service to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative community and cultural provision, the benefits of which clearly outweigh the loss of the current or former use.

New residential development will be required to contribute to the provision of new or enhanced community facilities in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. The on-site provision of new community facilities will be required on larger developments, where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities.

DPI7: Viability

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The economic viability of development is important in terms of supporting delivery in both plan making and the determination of planning applications. The District Council has accounted for the cumulative impact of its policy requirements on development viability, as part of the evidence base supporting the independent examination of its District Plan.

As a result, when negotiating site acquisitions and undertaking development feasibilities, account should be taken of all necessary requirements, and proposals should be designed in a way which accords with all Development Plan policies, including those regarding affordable housing provision.

The District Council is however aware that in some exceptional circumstances, a proposal may generate insufficient value to support the full range of developer contributions. In instances where, in the opinion of the applicant, a scheme cannot viably meet policy requirements, applicants will be required to robustly demonstrate that the site is clearly unviable by submitting for assessment a Viability Appraisal.

Viability Appraisal - Information requirements

Policy DPI7 identifies the criteria for considering development proposals where a non-policy compliant scheme is put forward. Table 1 of Appendix 3 contains the minimum information that should be contained within a Viability Appraisal. All assumptions applied to the Viability Appraisal model should be accessible and capable of variation to observe the impact of each on the model's outturn.

The costs and values included in the Viability Appraisal submitted to the District Council must be consistent with the corresponding information on current costs and values which the applicant is themselves relying upon to inform their own commercial decisions. A summary should be provided clearly setting out the exceptional reasons which it is felt are making the development proposal unviable.

A statement must also be included that the company undertaking the Viability Appraisal has not been instructed on the basis of performance related pay or incentivised in any other way according to the outcome of the viability process and the level of planning obligations which the applicant is required to provide.

Viability Assessment

On completion of the Viability Assessment the District Council will confirm whether additional planning obligations are required over and above those proposed by the applicant through their Viability Appraisal. Heads of Terms will be included in the District Council's Planning Report, reflecting the outcome of the viability process and an application will be refused if terms cannot be agreed.

Advanced Stage Viability Review

The financial viability of a scheme will change over time due to the prevailing economic climate and changing property values and construction costs. It may be notably different at the time of delivery, as a result of changes in market conditions and uncertainties at planning application stage. Consequently, the practice of viability review to ensure that proposals are based on an accurate assessment of viability at the point of delivery has become increasingly well established. Table 2 of Appendix 3 sets out the information required for an Advanced Stage Viability Review.

The aim of the Advanced Stage Viability Review is not to carry out a completely new Viability Assessment of every item, but to assess whether additional value has been generated since the planning application stage Viability Assessment was carried out, as a result of a change in the Gross Development Value or the Build Costs

Table 3 of Appendix 3 contains the formula used to calculate any additional financial contributions due. 40% of any surplus generated as a result of increased values or reduced costs will be retained by the Developer, as an additional profit allowance to that agreed in the planning application stage Viability Assessment, to ensure that they also benefit from an improvement in the schemes viability and are incentivised to make the scheme as profitable as possible by maximising values and minimising Build Costs.

Any contribution payable to the District Council will be capped according to the level of contribution still required by policy and associated guidance. For affordable housing contributions, this will be based on the level of surplus required to provide the affordable housing necessary to meet the affordable housing requirement. Any additional surplus above this will be retained in full by the Developer as additional profit.

If there is no surplus resulting from the application of the formula, because Build Costs have increased but values have not or values have increased less than Build Costs, no payment would be required towards meeting the infrastructure contributions and affordable housing provision due.

Advanced Stage Viability Reviews will be required on all residential / mixed use schemes which do not meet infrastructure contributions or the District Plan affordable housing requirement in full at the grant of planning permission and these will take place on the sale/letting of 75% of the market residential units. In the case of all other non-policy compliant schemes an Advanced Stage Viability Review will take place three months prior to the expected date of practical completion.

Disclosure

The District Council has the right to provide information to external parties advising it on viability matters to fulfil its statutory function as Local Planning Authority. Regardless of any decision not to make specific elements of an appraisal publicly available, information will also be made available, on a confidential basis, to Planning Committee members or any other District Council member who has a legitimate interest in seeing it.

The District Council may also need to release information to a third party where another body has a role in providing public subsidy, or where the application is subject to a planning appeal. Any decision not to disclose information will be subject to the District Council's obligations under the Freedom of Information Act and the Environmental Information Regulation.

DPI7: Viability

Where a planning application is not policy compliant, in respect of infrastructure contributions and/or Affordable Housing, at the time of submission the following approach will be taken:

I. A Viability Appraisal must be submitted by the applicant prior to validation of the planning application. It must be based on a policy compliant affordable housing scheme and the District Council's required tenure and size mix, and current costs and values. There must also be a clear correlation between a development's specification, Build Costs and development values.

II. It must be submitted in a clear and accessible format with full supporting evidence to substantiate the inputs and assumptions used. A full working electronic version of the Viability Appraisal model used will be required so that it can be fully tested and interrogated. The Viability Appraisal will be assessed by the District Council with advice from a suitably qualified external consultant/s and the cost of this external advice is to be borne by the Developer.

III. The Viability Assessment will consider whether the approach adopted and the inputs used are appropriate and adequately justified by evidence and experience. It will determine whether the level of infrastructure contributions and affordable housing provision proposed by the applicant are the maximum that can be viably supported or whether a greater level of policy compliance can be achieved.

IV. Where reductions in infrastructure contributions and/ or affordable housing provision are agreed on viability grounds at planning application stage the District Council will include the estimated Gross Development Value and Build Costs at this stage in a planning obligation, together with details of the required Advanced Stage Viability Review.

V. A viability review will be required later in the project, for all schemes where policy requirements are not met in full at the time planning permission is granted. This will enable any increase in viability to be calculated so that greater or full compliance with the Development Plan can be achieved. At the review stage accurate and up to date evidence of Build Costs and Sales Values, the key variables most likely to change over time, will be able to be provided for assessment.

VI. During the Advanced Stage Viability Review the Gross Development Value and Build Costs, will be re-assessed by the District Council with advice from a suitably qualified external consultant and the formula will be applied, to determine whether there has been an increase in viability from that anticipated when the planning application was submitted.

VII. If a surplus (i.e. further profit) results from the application of the formula, it will be split between the District Council and the Developer 60%/40% and the 60% payable to the District Council will be put towards infrastructure contributions and / or off-site affordable housing provision. This will enable policy requirements which were not deemed deliverable at planning application stage to be met in full or part.

VIII. All Viability Appraisals will be made publicly available on the planning register, in order to increase openness and transparency in the planning process. Redaction of any information will only be allowed in exceptional circumstances

The above policy will also apply where a Developer is asserting that it is not viable to provide 100% affordable housing in the case of a Rural Exception Site, and consequently wishes to provide an element of open market and / or self-build housing up to a maximum of 20% of the total.

17. Implementation and Monitoring

Monitoring is an essential process to ensure the District Plan is meeting its strategic objectives. Below is the monitoring framework for the District Plan. It sets out a range of indicators including output indicators that assess the impact of individual policies and contextual indicators that facilitate understanding of the wider context that may be influencing output indicators.

The indicators are reported through the Council's Authority Monitoring Report, usually on an annual basis. If it appears that policies are not being effective or are no longer appropriate in light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPS1: Climate Change	1, 5	The objectives listed under DPS1 are monitored under their separate policy areas	-	-	-
DPS2: Sustainable Design and Construction	1	Number of schemes meeting the 'Excellent' in the relevant BREEAM Technical Standard	Increase	Developer	Mid Sussex District Council monitoring
		Number of schemes meeting the 'Outstanding' rating in the relevant BREEAM Technical Standard	Increase	Developer	Mid Sussex District Council monitoring
		Number of schemes exceeding 100 litres per person per day	Decrease	Developer	Mid Sussex District Council monitoring
DPS3: Renewable and Low Carbon Energy Schemes	1	Number of renewable electricity installations	Increase	Developers, utility providers, local authority	Department for Business, Energy and Industrial Strategy
DPS4: Flood Risk and Drainage	1	Number of planning applications approved contrary to advice on flood risk/ flood defence grounds	Zero	Public agencies, local authority	Environment Agency

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPS5: Water Infrastructure and the Water Environment	1, 6	Number of planning applications approved contrary to advice given by the Environment Agency on water quality issues	Zero	Public agencies, Local Authority	Environment Agency/ Mid Sussex District Council monitoring
		Number of planning applications approved contrary to advice from the statutory sewerage/water undertaker	Zero	Statutory sewerage/ water undertakers, Local Authority	Mid Sussex District Council monitoring
		Incidents of major and significant water pollution within the District	Zero	Developers, Statutory sewerage/ water undertakers, Local Authority, Public agencies	Environment Agency
DPS6: Health and Wellbeing	1, 5, 6, 12, 13, 14, 15	Number of HIAs undertaken	Increase	Developer	Mid Sussex District Council monitoring
DPN1: Biodiversity, Geodiversity and Nature Recovery	3, 5	Amount of priority habitat lost	Zero	Public agencies, local authority	Sussex Biodiversity Records Centre monitoring
		Conditions of SSSIs	Improve	Public agencies, local authority	Sussex Biodiversity Records Centre monitoring
DPN2: Biodiversity Net Gain	3, 5	Percentage biodiversity net gain secured as demonstrated by the Biodiversity Metric	Maximise, but a minimum 10% biodiversity net gain	Developers	MSDC Monitoring Biodiversity Gain Plan
		Number and type of biodiversity units lost or gained	Maximise the biodiversity units gained	Developers	MSDC Monitoring Biodiversity Gain Plan
		Location of secured biodiversity net gain (on-site or off-site)	Secure relevant and meaningful biodiversity net gain linked to wider nature recovery	Developers	MSDC Monitoring Biodiversity Gain Plan

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPN3: Green Infrastructure	5, 6, 15	New green infrastructure assets	Increase	Developers	Mid Sussex District Council monitoring
DPN4: Trees, Woodland and Hedgerows	3, 4, 5	Area of ancient woodland lost	Zero	Developers, local authority	Sussex Biodiversity Records Centre monitoring
DPN5: Historic Parks and Gardens	3, 11	Number of applications permitted contrary to advice received from the Conservation Officer or Historic England	Zero	Local authority	Mid Sussex District Council monitoring
DPN6: Pollution	3, 12	Number of major pollution incidents in the District	Zero	Local authority	Mid Sussex District Council monitoring
DPN7: Noise Impacts	3, 12	Number of noise sensitive developments permitted close to sources of high levels of noise	Zero	Local authority	Mid Sussex District Council monitoring
DPN8: Light Impacts and Dark Skies	3, 12	Number of artificial lighting proposals permitted in the countryside	Minimise	Local authority	Mid Sussex District Council monitoring
DPN9: Air Quality	3, 12	Number of Air Quality Management Areas (AQMAs) in the District	Minimise	Local authority	Mid Sussex District Council monitoring
DPN10: Land Stability and Contaminated Land	3, 12	Number of land stability incidents	Zero	Local authority	Mid Sussex District Council monitoring
		Number of contaminated land incidents	Zero	Local authority	Mid Sussex District Council monitoring
DPC1: Protection and Enhancement of Countryside	3, 11, 15	Percentage of new and converted dwellings on previously developed (brownfield) land	Maximise	Developers, local authority	Mid Sussex District Council monitoring
		Amount of best and most versatile agricultural land lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPC2: Preventing Coalescence	2	Number of planning permissions granted in Local Gaps, where these have been defined in neighbourhood plans	Minimise	Local authority	Mid Sussex District Council monitoring
DPC3: New Homes in the Countryside	3, 10, 13	Number of applications for new dwellings in the countryside overturned on appeal	Zero	Local authority	Mid Sussex District Council monitoring
DPC4: High Weald Area of Outstanding Natural Beauty	3, 11	Number of applications approved contrary to advice from Natural England or the High Weald AONB Unit	Zero	Local authority	Mid Sussex District Council monitoring
DPC5: Setting of the South Downs National Park	3, 11	Number of applications refused as contrary to this policy but overturned on appeal	Zero	Public agencies, local authority	Mid Sussex District Council monitoring
DPC6: Ashdown Forest SPA and SAC	3	SANG capacity	Sufficient for anticipated development	Local authority	Mid Sussex District Council monitoring
		SAMM projects implemented	In line with SAMM Strategy	SAMM Partnership	Mid Sussex District Council monitoring
DPB1: Character and Design	1, 2, 3, 4, 5, 12, 14	Number of planning applications refused as contrary to this policy but overturned at appeal	Zero	Public agencies, local authorities	Mid Sussex District Council Planning
DPB2: Listed Buildings and Other Heritage Assets	2, 4, 11	Number of listed buildings within the district.	No deterioration	Local authority	Mid Sussex District Council monitoring
DPB3: Conservation Areas	2, 4, 11	Number of Conservation Areas with appraisals and management proposals	Increase	Local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPT1: Placemaking and Connectivity	5, 6, 8, 12, 14, 15	Number of sustainable transport schemes implemented	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of applications refused on transport grounds	Annual number	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of agreed travel plans in operation	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT2: Rights of Way and Other Recreational Routes	5, 15	Number of applications resulting in a net increase in rights of way	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of applications resulting in a net loss of rights of way	Minimise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT3: Active Travel	6	Increase in cycling as % of modal share	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of schemes identified in the LCWIP supported by applications	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT4: Parking and Electric Vehicle Charging Infrastructure	6	Number of charging points installed	Maximise	Local Authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT5: Off-Airport Car Parking	6	No net increase in off-airport parking	Minimise	Local Authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPE1: Sustainable Economic Development	1, 2	Net increase / decrease in commercial E(g), B2: General Industrial and B8	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Storage and Distribution			Availability Survey
		Employment land available – by type (net)	Monitor	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
		Provision of new employment floorspace in neighbouring authorities	Monitor of cross-boundary implications	Local Authorities	Local Authorities
		Number of new businesses setting up in the District	Maximise		Office for National Statistics
		Unemployment	Minimise		Office for National Statistics
DPE2: Existing Employment Sites	1, 2	Net increase / decrease in commercial E(g), B2: General Industrial and B8 Storage and Distribution floorspace	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE3: Employment Allocations	1, 2	Net increase / decrease in commercial Class E, B2: General Industrial and B8 Storage and Distribution floorspace	Net increase per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE4: Town and Village Centres	9	Net increase / decrease in commercial Class E, B2: General Industrial and B8 Storage and Distribution floorspace	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE5: Within Town and Village Centre Boundaries	9	Net increase / decrease in commercial Class E, B2: General Industrial and B8	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Storage and Distribution floorspace			Leisure Land Availability Survey
DPE6: Development within Primary Shopping Areas	9	Net increase / decrease in commercial Class E	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
		Net increase / decrease in non-town centre uses	Minimise	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE7: Smaller Village and Neighbourhood Centres	4	No net loss	Minimise	Local Authority	Mid Sussex District Council monitoring
DPE8: Sustainable Rural Development and the Rural Economy	4	Number of new commercial developments approved within the countryside	Increase	Developers, Local Authority	Mid Sussex District Council monitoring
DPE9: Sustainable Tourism and the Visitor Economy	7, 10, 11	New tourism accommodation or attractions	Number	Developers	Mid Sussex District Council monitoring
DPH1: Housing	12, 13	Housing completions in Mid Sussex	To meet identified needs	Developers, Local Authority, highway authority, public agencies, utility companies and service providers	Mid Sussex District Council/ West Sussex County Council annual monitoring
DPH2: Sustainable Development – Outside BUA	12, 13	Housing commitments by parish Neighbourhood Plan monitoring	No development to be permitted outside built-up area boundaries unless the site is allocated.	Mid Sussex District Council, Town and Parish Councils	Mid Sussex District Council Monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPH3: Sustainable Development – Inside BUA	12, 13	Housing commitments on ‘windfall’ or ‘unidentified’ sites	Maximise	Mid Sussex District Council	Mid Sussex District Council Monitoring
DPH4: General Principles for Housing Allocations	12, 13	The principles listed under DP7 are monitored under their separate policy areas	-	-	-
DPH5: Significant Site – Land at Ansty Farm, Cuckfield Road, Ansty	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH5	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH5	Developers	Mid Sussex District Council monitoring
DPH6: Significant Site – Land to the West of Burgess Hill	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH6	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH6	Developers	Mid Sussex District Council monitoring
DPH7: Significant Site – Land to the South of Reeds Lane, Sayers Common	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH7	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH7	Developers	Mid Sussex District Council monitoring
DPH8: Significant Site – Land at Crabbet Park	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH8	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH8	Developers	Mid Sussex District Council monitoring
DPH9-DPH29: Housing Site Allocations	12, 13	Number of dwellings completed	In accordance with relevant policy	Developers	Mid Sussex District Council monitoring
DPH26: Older Persons Accommodation	12, 13	Number of beds completed by type and tenure	Increase	Developers	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPH27: Land at Byanda, Hassocks	12, 13	Number of beds completed	In accordance with DPH31	Developers	Mid Sussex District Council monitoring
DPH28: Land at Hyde Lodge, Handcross	12, 13	Number of beds completed	In accordance with DPH32	Developers	Mid Sussex District Council monitoring
DPH29: Gypsies, Travellers and Travelling Showpeople	12, 13	Number of net permanent pitches completed	Maximise	Local authority	Mid Sussex District Council monitoring
		Number of unauthorised encampments	Minimise	Local authority	Mid Sussex District Council monitoring
DPH30: Self/ Custom Build	12, 13	Number of self-build or custom build dwellings completed	Maximise	Developers, local authority	Mid Sussex District Council monitoring
DPH31: Housing Mix	12, 13	Number of dwellings granted planning permission by size (no. of beds)	In accordance with DPH35	Developers, local authority	Mid Sussex District Council monitoring
		Provision of each accommodation by type of total (%)	To reflect need	Developers, local authority	Mid Sussex District Council monitoring
DPH32: Affordable Housing	12, 13	Gross number of affordable homes completed	Maximise	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring
		Financial contributions towards affordable housing provision	Maximise in compliance with DPH36	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring
DPH33: First Homes	12, 13	Number of first homes completed	Maximise	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring
DPH34: Rural Exception Sites	12, 13	Number of affordable housing dwellings completed on rural exception sites	Maximise in compliance with DPH38	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPH35: Dwelling Space Standards	12, 13	Number of planning applications refused contrary to this policy but overturned on appeal	Zero	Developers, local authority	Mid Sussex District Council monitoring
DPH36: Accessibility	12, 13, 14	Number of planning applications refused contrary to this policy but overturned on appeal	Zero	Developers, local authority	Mid Sussex District Council monitoring
DPI1: Securing Infrastructure	6	Infrastructure provided through development	Infrastructure provided	Developers, local authority	Mid Sussex District Council monitoring
DPI2: Planning Obligations	6	Section 106 planning obligations monitoring	Amount secured, received and spent	Local authority	Mid Sussex District Council monitoring
DPI3: Major Infrastructure Projects	6	Number of EIA planning applications received	Infrastructure provided	Developers, local authority	Mid Sussex District Council monitoring
		Number of applications the Council is consulted on	Monitor	Developers, local authority	Mid Sussex District Council monitoring
DPI4: Communications Infrastructure	6, 7, 8	Amount of digital infrastructure installed	Maximise	Public agencies, local authority	Mid Sussex District Council monitoring
DPI5: Open Space, Sport and Recreational Facilities	6, 15	Amount of open space, leisure, sport and recreational facilities provided	In line with requirements	Developers, local authority	Mid Sussex District Council monitoring
		Amount of open space, leisure, sport and recreational facilities lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring
DPI6: Community and Cultural Facilities and Local Services	6, 12, 15	Amount of community and cultural facilities and local services provided	In line with requirements	Developers, local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Amount of community and cultural facilities and local services lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring

18. Saved Policies

On adoption of the District Plan most of policies in the Mid Sussex District Plan (2018) will be replaced this District Plan. In addition, three policies from the Site Allocations DPD (2022) will also be replaced by policies in this District Plan.

There are also allocations from the Mid Sussex Local Plan (2004) and Small Scale Housing Allocations DPD (2008) which have not been implemented and will continue to be saved policies on adoption of this District plan.

The tables below set out which policies will be replaced and which policies continue to form part of the development plan.

Site Allocations Development Plan Document (2022) Policies that will be replaced on adoption of the District Plan 2021 - 2039

Site Allocation DPD Policy	Reason/ Replacement policy
SA GEN	Replaced by Annex1 and District Plan 2039 when read as a whole.
SA 1 Sustainable Economic Development	Individual site allocations remain saved
SA10 Housing	Replaced by DPH1
SA11 Housing allocations	Individual site allocations remain saved
SA38 Air Quality	Replaced by DPN9 Air Quality
SA34 Existing Employment Sites	Replaced by DPE2: Existing Employment Sites

District Plan (2018) Policies that will be replaced on adoption of the District Plan 2021 - 2039

District Plan Policy	Reason/ Replacement policy
DP1 Sustainable Economic Development	DPE1
DP2 Town and Village Centre Development	DPE4
DP3 Within Town and Village Centre Boundaries	DPE5 DPE6
DP4 Housing	DPH1
DP5 Planning to Meet Future Housing Need	not replaced
DP6 Settlement Hierarchy	DPH2 DPH3
DP12 Protection and Enhancement of the Countryside	DPC1
DP13 Preventing Coalescence	DPC2
DP14 Sustainable Rural Development and the Rural Economy	DPE7
DP15 New Homes in the Countryside	DPC3
DP16 High Weald Area of Outstanding Natural Beauty	DPC4
DP17 Ashdown Forest SPA and SAC	DPC6
DP18 Setting of the South Downs National Park	DPC5
DP19 Sustainable Tourism and the Visitor Economy	DPE8
DP20 Securing Infrastructure	DPI1
DP21 Transport	DPT1

DP22 Rights of Way	DPT2
DP23 Communications Infrastructure	DPI4
DP24 Leisure and Cultural Facilities	DPI5
DP25 Community and Local Services	DPI6
DP26 Character and Design	DPB1
DP27 Space Standards	DPH39
DP28 Accessibility	DPH40
DP29 Noise, Air and Light pollution	DPN6 DPN7 DPN8
DP30 Housing Mix	DPH35
DP31 Affordable Housing	DPH36
DP32 Rural Exception Sites	DPH38
DP33 Gypsies, Travellers and Travelling Showpeople	DPH33
DP34 Listed Buildings and Other Heritage Assets	DPB2
DP35 Conservation Areas	DPB3
DP36 Historic Parks and Gardens	DPN5
DP37 Trees, Woodland and Hedgerows	DPN4
DP38 Biodiversity	DPN1
DP39 Sustainable Design and Construction	DPS2
DP40 Renewable Energy Schemes	DPS3
DP41 Flood Risk and Drainage	DPS4
DP42 Water Infrastructure and the Water Environment	DPS5

Local Plan (2004) Policies that will no longer be saved on adoption of the District Plan 2021 - 2039

Saved Local Plan Policy	Reason
Burgess Hill	
BH1 Open Air Market, Cyprus Road	Burgess Hill Neighbourhood Plan polices, allow for residential development on site. No evidence of deliverability since site allocated in 2004.
BH2 The Oaks Centre, Junction Road	No evidence of deliverability since site allocated in 2004. Site in built up area and could come forward as windfall development subject to other policies in the Development Plan.
BH3 Station Yard and Car Park Burgess Hill	Subject to review
East Grinstead	
EG2 The Portlands	Policy superseded by East Grinstead Neighbourhood Plan Policy EG4a.
EG5 East Grinstead Lawn Tennis Club	Land owner confirmed site not available for development.
Haywards Heath	
HH11 Land north of Rookery Farm	Policy superseded by Haywards Heath Neighbourhood Plan Policy H2. Site under construction.

Pease Pottage	
PP1 Hemsley nursery – residential (implemented) and public open space (not implemented)	Public Open Space now implemented
Turners Hill	
TH1 Land at Clock Field	Development complete
Rural Areas	
RA2 Rowfant Business Centre	The objectives of this policy are duplicated in other District Plan policies including DPT1 Transport. Site specific policy no longer required. Policy brought forward into Turners Hill Neighbourhood Plan.

Small Scale Housing Site Allocations DPD (2008) will no longer be saved on adoption of the District Plan 2021 - 2039

Small Scale Housing Site Allocations DPD Policy	Reason
SSH/1 Dunnings Mill Squash Club, East Grinstead	Implemented
SSH/2 Land at Junction of Windmill Lane and London Road, East Grinstead	Not implemented but no evidence that site is deliverable
SSH/3 Sandrocks Rocky Lane Haywards Heath	Implemented
SSH/4 Covers Timber Yard, Fairfield Way Burgess Hill	Implemented
SSH/5 Gas Holder Site Leyland Road Burgess Hill	Implemented
SSH/7 land south of the old Convent Moat Road East Grinstead	Implemented
SSH/8 L/A Moatfield Surgery St Michael's Road East Grinstead	Implemented
SSH/9 Land south of Grange Road Crawley Down	Implemented
SSH/10 land north west of Chatfield Road Cuckfield	Implemented
SSH/11 land at Gravelye lane/ Lyoth Lane Lindfield	Implemented
SSH/12 Land rear of Newton Road Lindfield	Implemented
SSH/13 Fodlers Meadow Burgess Hill	Implemented
SSH/14 Keymer Tiles Works Nye Road Burgess Hill	Implemented
SSH/15 Land north of Matlings Park Burgess Hill	Implemented
SSH/16 land adjacent to Manor Road Burgess Hill	Implemented

SSH/17 Land west of Mackie Avenue Hassocks	Implemented
SSH/18 land adjoining Ashplatts House Holtyle Road East Ginstead	Implemented

District Plan Policies that will be saved on adoption of the District Plan 2021 - 2039

Saved District Plan Policy	Policy type	Reason
DP7: General Principles for Strategic Development at Burgess Hill	Strategic allocation	Policy yet to be fully implemented
DP8: Strategic Allocation to the east of Burgess Hill Kingsway	Strategic allocation	Policy yet to be fully implemented
DP9: Strategic Allocation to the north and north-west of Burgess Hill	Strategic allocation	Policy yet to be fully implemented
DP10: Strategic Allocation to the east of Pease Pottage	Strategic allocation	Policy yet to be fully implemented
DP11: Strategic Allocation to the north of Clayton Mills	Strategic allocation	Policy yet to be fully implemented

Site Allocations Development Plan Document (2022) Policies that will be saved on adoption of the District Plan 2021 - 2039

Site Allocation DPD Policy	Policy type	Reason
SA2 Burnside Centre, Victoria Road	Employment Allocation	Not implemented
SA3 Site of Former KDG, Victoria Road	Employment Allocation	Not implemented
SA4 Land north of the A264 at Junction 10 of M23	Employment Allocation	Not implemented
SA5 Land at Bolney Grange Business Park	Employment Allocation	Not implemented
SA6 Marylands Nursery, Cowfold Road	Employment Allocation	Not implemented
SA7 Cedars, Brighton Road	Employment Allocation	Not implemented

SA8 Pease Pottage Nurseries, Brighton Road	Employment Allocation	Not implemented
SA9 Science and Technology Park	Employment Allocation	Not implemented
SA12 Land south of 96 Folders Lane	Housing Allocation	Not implemented
SA13 land south of Folders lane and east of Keymer road	Housing Allocation	Not implemented
SA14 land south of Selby Close	Housing Allocation	Not implemented
SA15 land south of Southway	Housing Allocation	Not implemented
SA16 St Wilfird's School	Housing Allocation	Not implemented
SA17 Woodfield House	Housing Allocation	Not implemented
SA18 Former East Grinstead Police Station	Housing Allocation	Not implemented
SA19 Land south Crawley Down Road	Housing Allocation	Not implemented
SA20 land south and west of Imberhorne School	Housing Allocation	Not implemented
SA21 land at Rogers Farm	Housing Allocation	Not implemented
SA22 land north of Burleigh Lane	Housing Allocation	Not implemented
SA23 land at Hanlye lane	Housing Allocation	Not implemented
SA24 land north of Shepherds Walk	Housing Allocation	Not implemented
SA25 land west of Selsfield Road	Housing Allocation	Not implemented
SA 26 land south of Hammerwood Road	Housing Allocation	Not implemented
SA27 land at St Martin close (West)	Housing Allocation	Not implemented
SA28 land south of The Old Police House	Housing Allocation	Not implemented
SA29 land south of St Stephens Church	Housing Allocation	Not implemented
SA30 land north of Lyndon Reeds lane	Housing Allocation	Not implemented
SA31 Land to rear of Firlands Church Road	Housing Allocation	Not implemented

SA32 Withypitts Selsfield Road	Housing Allocation	Not implemented
SA33 Ansty Cross Garage	Housing Allocation	Not implemented
SA35 Safeguarding land for Strategic Highway improvements	Safeguarding	Not implemented
SA36 Wivelsfield Station	Safeguarding	Not implemented
SA37 Burgess Hill/ Haywards Heath cycle network		Not implemented

Small Scale Housing Allocation DPD Policies that will be saved on adoption of the District Plan 2021 - 2039

Saved Small Scale Housing DPD Policy	Policy type	Reason
SSH/6 Station Goods Yard, Keymer Road, Hassocks	Housing allocation	Not implemented

Local Plan (2004) Policies that will continue to be saved on adoption of the District Plan 2038

Saved Local Plan Policy	Policy type	Reason
East Grinstead		
EG8 Stonequarry Woods	Housing	Planning Application pending consideration December 2021. Shows intention of land owner to bring site forward for housing development.

19. Glossary

Abbreviations

AONB Area of Outstanding Natural Beauty

AQMA Air Quality Management Areas

BOA Biodiversity Opportunity Area

BREEAM Building Research Establishment Environment Assessment Method

CIL Community Infrastructure Levy

DCO Development Consent Order

DPD Development Plan Document

HDT Housing Delivery Test

HIA Health Impact Assessment

HRA Habitats Regulations Assessment

IDP Infrastructure Delivery Plan

LDD Local Development Document

LDF Local Development Framework

LCWIP Local Cycling and Walking Infrastructure Plan

LDS Local Development Scheme

LEP Local Economic Partnership

LNR Local Nature Reserve

LPA Local Planning Authority

LSP Local Strategic Partnership

MR Monitoring Report

NPPF National Planning Policy Framework

NPPG National Planning Practice Guidance

NPs National Policy Statement

NSIP Nationally Significant Infrastructure Projects

OAN Objectively Assessed Need

PDL Previously Developed Land

PPG Planning Practice Guidance

RIGS Regionally Important Geological and Geomorphological Sites

SA Sustainability Appraisal

SAC Special Area of Conservation

SANG Suitable Alternative Natural Greenspace

SAMM Strategic Access Management and Monitoring

SCI Statement of Community Involvement

SEA Strategic Environmental Assessment

SFRA Strategic Flood Risk Assessment

SHMA Strategic Housing Market Assessment

SNCI Site of Nature Conservation Importance

SPA Special Protection Area

SPD Supplementary Planning Document

SSSI Sites of Special Scientific Interest

SuDS Sustainable Drainage Systems

Affordable Housing: housing for sale or rent, for those whose needs are not normally met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter Homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections: The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and household prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for

sale (at a price equivalent to at least 20% below market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Ancient Woodland – Areas that have had continuous woodland cover since 1600, non-statutory designations.

Aged or veteran tree – A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape or culturally.

Appropriate planning document – This could be a Development Plan Document, a Supplementary Planning Document, or technical note depending upon the role and objective of the document.

Area of Outstanding Natural Beauty (High Weald AONB) – Areas designated to conserve and enhance natural beauty, wildlife and cultural heritage; and to meet the need for quiet enjoyment of the countryside and have regard for the interests of those who live and work within them.

Biodiversity Net Gain – An approach to development that leaves development in a better state than before.

Biodiversity Opportunity Area – Areas that identify where the greatest opportunities for habitat creation and restoration lie at a landscape scale; they enable the efficient focusing of resources to where they will have the greatest positive conservation impact, representing a more efficient way of delivering action on the ground.

Burgess Hill Town-Wide Strategy – This strategy, prepared by Burgess Hill Town Council, sets out the general principles, visions and objectives for Burgess Hill over the plan period and provides a foundation on which policies addressing strategic development at Burgess Hill are based.

Carbon capture – A process to store carbon dioxide. Nature-based solutions to carbon capture can include restoration of ecosystems and tree planting to increase natural carbon storage. Nature-based solutions can also have benefits for biodiversity and nature recovery.

Carbon sequestration – The process of capturing and storing atmospheric carbon dioxide to reduce the amount of carbon dioxide in the atmosphere in response to climate change. Examples of carbon sequestration include storing carbon in trees through afforestation.

Carbon sink – An ecosystem that absorbs more carbon from the atmosphere than it releases, for example, plants, trees, soil and the ocean.

Circular Economy – The circular economy is a [model of production and consumption](#), which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended and the production of waste is minimised.

Climate Change – Climate change is a large-scale, long-term shift in the planet’s weather patterns or average temperatures (MET Office)

Commitments – Sites already in the planning process which have planning permission for residential development or are allocated in a Development Plan Document.

Community Facilities and Local Services – Public locations that meet a range of community needs such as providing support services, public information, and space for group activities. Includes local shops, places of worship, public houses, education facilities, health and care facilities, libraries, emergency services, and community centres.

Community Infrastructure Levy – A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Comparison shopping – The provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Contiguous – sharing a common border, touching

Convenience Retailing Relates to the purchase of everyday essential items, including confectionary, food and drink, of goods in classification of individual consumption according to purpose (COCIP) categories such as: food and non-alcoholic beverages, tobacco, alcoholic beverages (off-trade), newspapers and periodicals, non-durable household goods.

Development Plan – As set out in section 38(6) of the Planning and Compulsory Purchase Act, an area’s development plan consists of the Development Plan Documents contained within the Local Development Framework.

Development Plan Documents (DPDs) – These documents include the District Plan and the Small Scale Housing Allocation Development Plan Document.

District Plan – This document is the principal Development Plan Document, setting out the long-term strategic vision for the District, as well as objectives for the area and strategic policies.

Ecosystem services – The benefits and services provided to people and wider society by the natural environment. Ecosystem services are categorised into four types, however, there is significant interaction between them: Provisioning Services, Regulating Services, Supporting Services and Cultural Services.

Economic Viability – The financial feasibility of development.

Evidence base – The evidence that any development plan document, in particular the District Plan, is based on. It is made up of the views of stakeholders and background facts about the area.

Geodiversity – The range of rocks, minerals, fossils, soils and landforms.

Green Infrastructure – A network of multi-functional green and blue spaces and other natural features, urban and rural which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Gypsies and Travellers – Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Habitats Regulations Assessment – An assessment of the potential effects of planning policies on European nature conservation sites.

Habitats Site: Any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of these regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Sites of Community Importance, Special Protection Areas and any relevant Marine Sites.

High Quality Business Park - a location which provides an appropriate mix of high quality well designed B1(b), B1(c), B2 and B8 premises set within a high quality public realm. The premises should offer a range and appropriate mix of sizes in order to accommodate different business requirements and to meet local employment needs.

Housing Delivery Test: Measures net homes delivered

Infrastructure – Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open spaces. Examples of key infrastructure categories, and the elements within each group are provided as follows.

Infrastructure Category	Elements Relevant to Mid Sussex
Transport	<ul style="list-style-type: none"> • Road networks • Rail networks • Bus services • Cycling, walking and equestrian routes • Other public rights of way (PROW) • Parking facilities
Education	<ul style="list-style-type: none"> • Pre-school and nursery schools • Primary and secondary education • Further and higher education • Special educational needs • Adult education
Health	<ul style="list-style-type: none"> • GPs, health centres and other community care facilities such as day-care centres • Clinical Commissioning Groups • Mental health hospitals and other support • Acute and general hospitals • Dental practices • Social care
Social Infrastructure	<ul style="list-style-type: none"> • Specialist accommodation and care falling within Use Class C2

	<ul style="list-style-type: none"> • Social and community facilities, including buildings • Cultural facilities such as arts centres and museums • Sports centres and other recreation facilities • Sports pitches • Play space
Green Infrastructure	<ul style="list-style-type: none"> • Flood defences and flood management schemes • Sustainable Drainage Systems (SuDS) • Open spaces and parks • Allotments • Biodiversity and nature conservation
Green Infrastructure – Habitats Regulations mitigation	<ul style="list-style-type: none"> • Interventions necessary to mitigate the effects of development on nature conservation sites • Suitable Alternative Natural Greenspace (SANG) • Strategic Access Management and Monitoring (SAMM)
Blue Infrastructure	<ul style="list-style-type: none"> • Water network (that supports native species, maintains natural ecological processes prevents flooding, sustains air and water resources and contributes to the health and quality of life of local communities)
Public and Community Services	<ul style="list-style-type: none"> • Emergency services (ambulance, fire and rescue, police) • Community safety schemes • Libraries • Places of worship • Cemeteries • Waste management and disposal, including recycling facilities

Infrastructure Delivery Plan – Identifies infrastructure needed to support new homes and businesses over the Plan period.

Leisure and Cultural Facilities – This term refers to a broad range of facilities that are available to and enjoyed by the general public for arts, culture, sport and physical activity services including play spaces, open space, sports facilities, cinemas, museums, galleries, heritage and performance spaces.

Listed Building – A building of ‘special architecture or historic interest’ included on a statutory list compiled by the Secretary of State for Digital, Culture, Media and Sport

Local Community – A generic term, which includes all individuals (including the general public) and organisations external to the District Council. It includes the statutory and other consultees.

Local Development Document – The collective term for documents that form part of the Local Development Framework. These documents can either be a Development Plan Document, a Supplementary Planning Document or the Statement of Community Involvement.

Local Development Framework – Introduced by the Planning and Compulsory Purchase Act 2004 as the replacement for Local Plans. It is the term used to describe the whole portfolio of planning policy documents (Local Development Documents) setting out the planning strategy and policies for the area. It consists of Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.

Local Development Scheme – This document sets out the timetable for the preparation of the Local Development Documents. It identifies which Development Plan Documents and Supplementary Planning Documents are to be produced and when.

Local Enterprise Partnership (LEP) - A body, which was designated by the Secretary of State for Communities and Local Government and was established for the purpose of creating or improving the conditions for economic growth in an area.

Local Nature Reserve (LNR) – Designated by the local authority and managed for either nature conservation or to provide recreational opportunities to communities.

Local Distinctiveness – Local distinctiveness is the physical, environmental, economic or social factors that characterise an area (and most likely a combination of all four), as well as how an area interacts with others.

Localism Act 2011 – The Localism Act contains a new power of competence for local government, new Neighbourhood Plans and development orders, and a new duty to co-operate to replace Regional Strategies. It was given Royal Assent of 15th November 2011.

Mineral Consultation Area – A geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

Mobility hub – a recognisable place with an offer of different and connected transport modes supplemented with enhanced facilities and information features to both attract and benefit the traveller such as ‘real time’ passenger information, delivery lockers and e-bike/micro-mobility hire.

Monitoring Report – Part of the local development framework, the annual monitoring report assesses the implementation of the local development scheme and the extent to which policies in local development documents are being successfully implemented.

National Park (South Downs National Park) – Areas designated to conserve and enhance the natural beauty, wildlife and cultural heritage; and to promote opportunities for the understanding and enjoyment of the special qualities of the park.

Multi-functional – Where greenspace or rooms are able to perform a range of functions, affording greater social, environmental and economic benefits.

National Planning Policy Framework 2012 (NPPF) – Sets out the Government’s planning policies for England, and provides a framework within which local people and their accountable councils can produce their own distinctive local and Neighbourhood Plans, which reflects the needs and priorities of their communities.

National Planning Practice Guidance 2014 (NPPG) – A web-based resource containing categorised planning guidance to accompany national planning policy.

National Space Standards –

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

* Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m² as shown bracketed.

Nature Improvement Areas – Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.

NPs National Policy Statement – sets out government policy and provides the legal framework for planning decisions.

NSIP Nationally Significant Infrastructure Projects –large scale projects falling into five categories (Energy, transport, water, waste water and waste)

Neighbourhood Centre/Local Centre - provided alongside housing development to meet the day to day needs of the local community. Uses include retail, education, health, employment, leisure, recreation and community uses sufficient to meet the day to day needs of the local community. The retail provision should be no more than 2,500m² within a single unit subject to it being demonstrated that there would not be a significant adverse impact on Burgess Hill or Haywards Heath Town Centres.

Neighbourhood Plans – Neighbourhood plans are a new way for communities to decide the future of the places where they live and work. The Government introduced the right to prepare Neighbourhood Plans through the Localism Act.

Objectively Assessed Need – The total amount of housing that would be needed to meet, as a minimum, expected levels of growth in population over the plan period. This level of growth expected should take into account demographics (i.e. birth/death rates and migration) and other signals that could influence future trends in demographics.

Policies Map – The adopted Policies Map illustrates all of the policies and proposals in the Development Plan Document and any saved policies that are included in the Local Development Framework.

Previously Developed Land (also known as brownfield land) - Land which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Priority habitats and species – Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Recreational Routes – These are routes usually created by local authorities, government agencies or volunteer organisations. The routes are usually waymarked and mainly follow existing rights of way. Recreational routes are an important leisure resource alongside the network of existing public rights of way.

Regionally Important Geological and Geomorphological Sites (RIGS) – Also referred to as Local Geological Sites, these are locally designated sites important for geology and geomorphology (i.e. the Earth's landforms and the processes which shape them). Although not having formal statutory protection, RIGS are often also designated as SSSIs.

Rural exception sites – Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Science Park – A business support environment that encourages and supports the start-up, incubation and development of innovation-led, high-growth, knowledge-based businesses. Initiatives called by other names such as Research Park, Innovation Centre, Technology Park, Technopole or technology-based Incubator – where they aspire to meet the essential criteria set out above - are also included within the definition.

Section 106 Agreement – A binding agreement between the Council and a developer on the occasion of granting a planning permission, regarding matters linked to the proposed development. Used to secure matters necessary to render planning applications acceptable by offsetting the costs of the external effects of development e.g. on local schools, which could not be secured through the imposition of planning conditions.

Section 278 Agreement – A binding agreement between the County Council and a developer used to secure necessary highway improvements to make development acceptable in planning terms.

Sites of Nature Conservation Importance (SNCI) – Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local development plan.

Sites of Special Scientific Interest (SSSI) – Areas identified by Natural England as being of special interest for their flora, fauna, or geological or physiographical features.

Strategic Allocations and/or Strategic Development – These are allocations for specific or mixed uses of development contained in Development Plan Documents. The policies in the document will identify any specific requirements for individual allocations.

Strategic Site – A site that delivers 500 dwellings or more that is likely to contribute to a wider than local need and trigger the need for additional services. A strategic site would often provide on-site infrastructure such as a school, community facility, shop or employment land.

Special Area of Conservation (SAC) – Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Area (SPA) – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Suitable Alternative Natural Greenspace (SANG) – Green space that is of a quality and type suitable to be used as mitigation for the potential impact of development near the Ashdown Forest Special Protection Area.

Sustainable Community Strategy – Community strategies promote the economic, social and environmental well-being of their areas and contribute to the achievement of sustainable development. A copy of the Mid Sussex Sustainable Community Strategy can be viewed on the Mid Sussex District Council website at: www.midsussex.gov.uk, from the Community Service link.

Stakeholders – Stakeholders include any person or organisation, local or national, who have a legitimate interest in what happens in our area.

Strategic Access Management and Monitoring (SAMM) – A strategy setting out the measures that provide part of the mitigation for new residential development within 7km of the Ashdown Forest SPA. These measures focus on protecting the SPA from new recreational pressures through managing access (visitor) behaviour and monitoring both birds and visitors.

Strategic Flood Risk Assessment (SFRA) – An assessment by the District Council to inform the Local Development Framework of fluvial, surface water, groundwater, infrastructure and reservoir flood risks.

Supplementary Planning Documents – These documents provide supplementary information to the policies in the Development Plan Documents. They do not form part of the Development Plan and are not subject to independent examination.

Sustainability – The creation or maintenance of conditions that fulfil current and future economic, environmental and social requirements.

Sustainability Appraisal – Sustainability Appraisal is a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, economic and environmental factors). It is required under the Planning and Compulsory Purchase Act to be carried out on all Development Plan Documents and Supplementary Planning Documents.

Sustainable Development – Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The National Planning Policy Framework places a requirement on local planning authorities to positively seek opportunities to meet the development needs of their area and guide development to sustainable solutions.

Sustainable Drainage Systems (SuDS) – These are drainage systems designed to manage surface water and groundwater to sustainably reduce the potential impact of new and existing developments.

Sustainable Transport Modes – Including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.

Travelling Showpeople – Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

Appendix 1: District Plan Policies – Review Status

Review Status

- **No Update Required:** Policy as written in the District Plan does not require any amendment – remains ‘in date’ with full weight.
- **Minor Update:** 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 or requirements 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.

Policy	Review Status	Reason
DP1: Sustainable Economic Development	Major Update	<ul style="list-style-type: none"> • Update Employment Need figures and economic forecasting, further allocations if required • To reflect the additional requirements set out in the revised NPPF (July 2021)
DP2: Town Centre Development	Major Update	<ul style="list-style-type: none"> • To update Shopping Frontage and any re-definition of town centre boundaries • To reflect evidence base updates, particularly retail needs • To reflect amendments set out in the revised NPPF (July 2021) • To reflect Covid-19 impacts and potential options to facilitate recovery
DP3: Village and Neighbourhood Centre Development	Major Update	<ul style="list-style-type: none"> • To reflect any amendments to be made to the Retail settlement hierarchy • To review change of use restrictions given Covid-19 impacts and to facilitate recovery • To review whether neighbourhood centres should be a requirement for new developments over a certain threshold
DP4: Housing	Major Update	<ul style="list-style-type: none"> • To account for revised Housing Requirement in light of Standard Method and unmet need • To establish the latest position in terms of current supply (completions/commitments) • To set out a strategy/sites to meet the housing need
DP5: Planning to Meet Future Housing Need	N/A	<ul style="list-style-type: none"> • The objectives of this policy are to be addressed through the preparation of the District Plan Review and set out as part of the Plan Strategy
DP6: Settlement Hierarchy	Major Update	<ul style="list-style-type: none"> • To review appropriateness of the ‘contiguous’ policy and to clarify the wording in relation to built-up areas • To review the Settlement Hierarchy and approach to distributing need in accordance with a potentially revised strategy

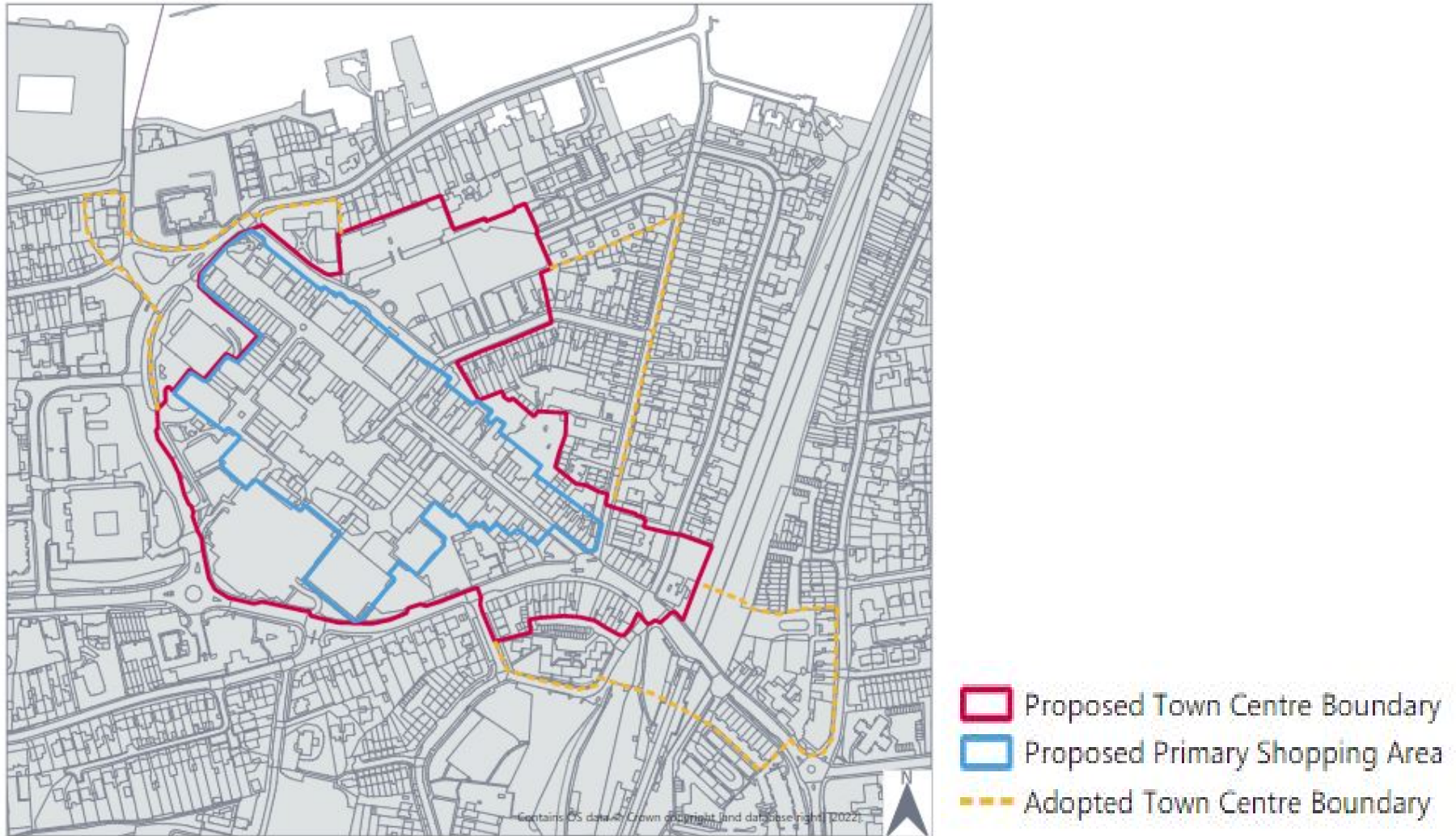
DP7 – DP11: Site Allocations	N/A	To be saved (i.e. will remain as ‘Commitments’ until development complete)
DP12: Protection and Enhancement of Countryside	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP13: Preventing Coalescence	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP14: Sustainable Rural Development and the Rural Economy	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) To reflect Covid-19 impacts and facilitate recovery
DP15: New Homes in the Countryside	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) Minor updates to references / for clarity
DP16: High Weald Area of Outstanding Natural Beauty	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP17: Ashdown Forest SPA and SAC	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy currently. Review may be required should the SANG/SAMM strategy require amendment – monitor.
DP18: Setting of the South Downs National Park	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP19: Sustainable Tourism	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP20: Securing Infrastructure	Major Update	<ul style="list-style-type: none"> To remove reference to pooling restrictions Update will be required should national policy or legislation introduce additional mechanisms for collecting developer contributions (e.g. National Infrastructure Levy)
DP21: Transport	Major Update	<ul style="list-style-type: none"> To reflect updated West Sussex Transport Plan To reflect the additional requirements set out in the revised NPPF (July 2021) To assess potential for additional parking/EV standards
DP22: Rights of Way and Other Recreational Routes	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP23: Communication Infrastructure	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity

DP24: Leisure and Cultural Facilities and Activities	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP25: Community Facilities and Local Services	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP26: Character and Design	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Add reference to Design Guide
DP27: Dwelling Space Standards	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP28: Accessibility	Minor Update	<ul style="list-style-type: none"> To reflect updated evidence within the SHMA The aims and objectives of this policy remain in date and consistent with national policy and current building regulations
DP29: Noise, Air and Light Pollution	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. An update to the 'air' element was included in the Sites DPD
DP30: Housing Mix	Major Update	<ul style="list-style-type: none"> Review of housing mix and whether the policy should be more specific C2 Need – to be addressed in this policy or standalone G&T Need – to be reviewed alongside DP33
DP31: Affordable Housing	Minor Update	<ul style="list-style-type: none"> Affordable housing need to be assessed in a revised SHMA, policy to be updated to reflect this evidence.
DP32: Rural Exception Sites	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP33: Gypsies, Travellers and Travelling Showpeople	Major Update	<ul style="list-style-type: none"> An update will be required to account for updated G&T needs evidence
DP34: Listed Buildings and Other Heritage Assets	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP35: Conservation Areas	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP36: Historic Parks and Gardens	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.

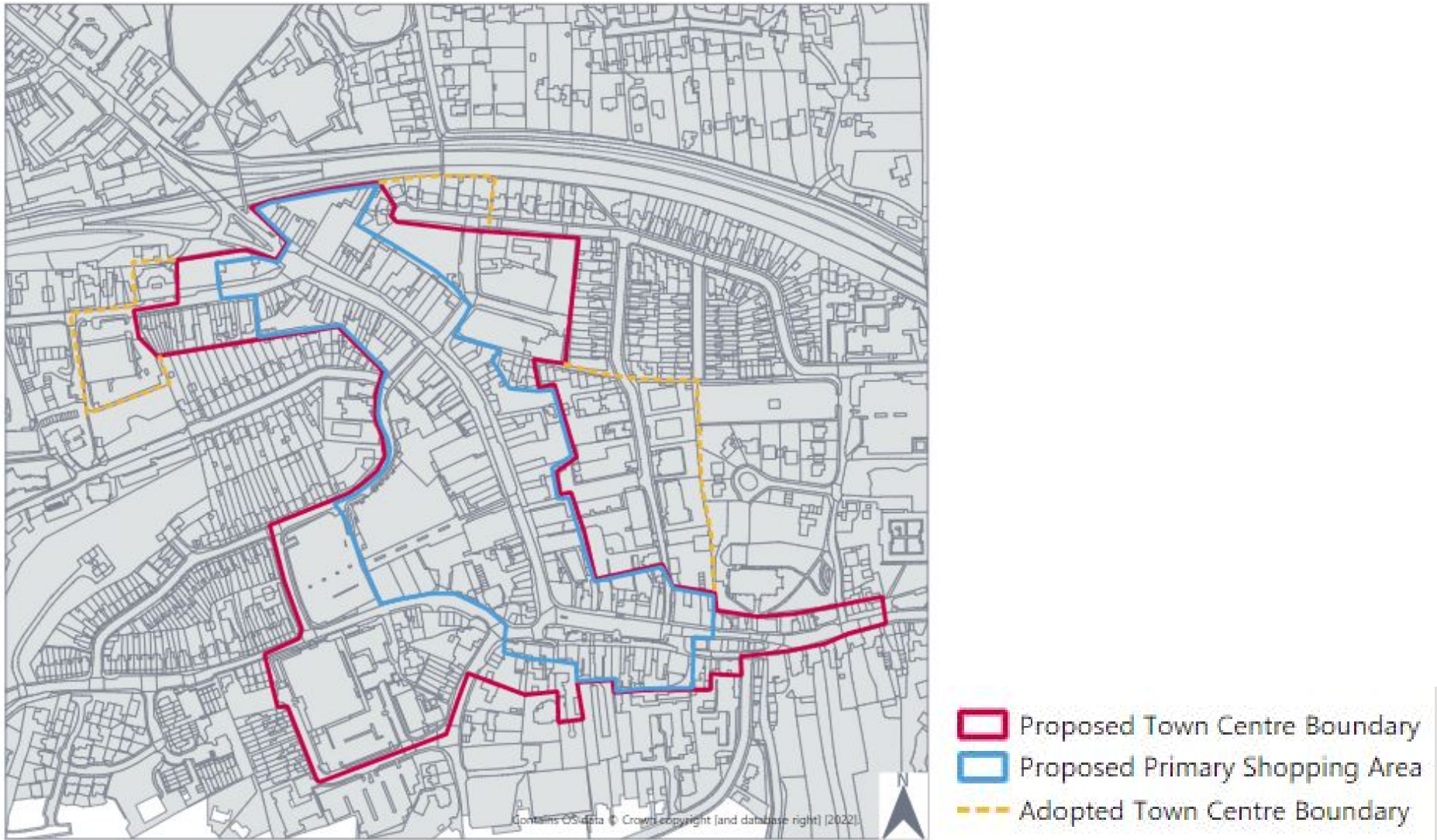
DP37: Trees, Woodland and Hedgerows	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP38: Biodiversity	Major Update	<ul style="list-style-type: none"> To account for forthcoming Government guidance on Biodiversity Net Gain
DP39: Sustainable Design and Construction	Major Update	<ul style="list-style-type: none"> To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) To reflect the additional requirements set out in the revised NPPF (July 2021)
DP40: Renewable Energy Schemes	Minor Update	<ul style="list-style-type: none"> Policy provides sufficient support and therefore is in accordance with the revised NPPF (July 2021) Minor updates to references / for clarity
DP41: Flood Risk and Drainage	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP42: Water Infrastructure and the Water Environment	Minor Update	<ul style="list-style-type: none"> To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) To reflect the additional requirements set out in the revised NPPF (July 2021)

Appendix 2: Town Centres and Primary Shopping Area Boundaries

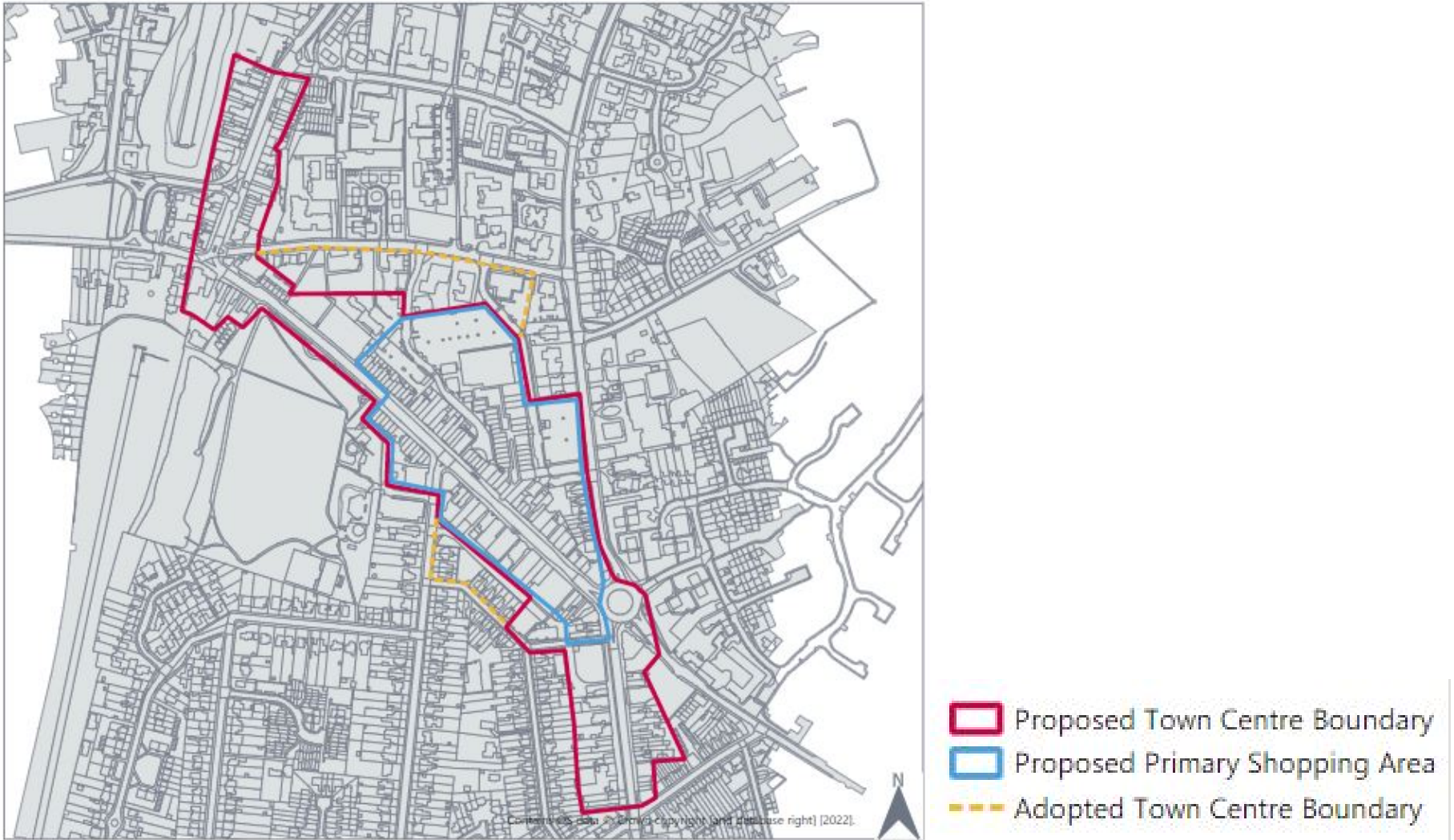
Burgess Hill Town Centre



East Grinstead Town Centre



Haywards Heath Town Centre

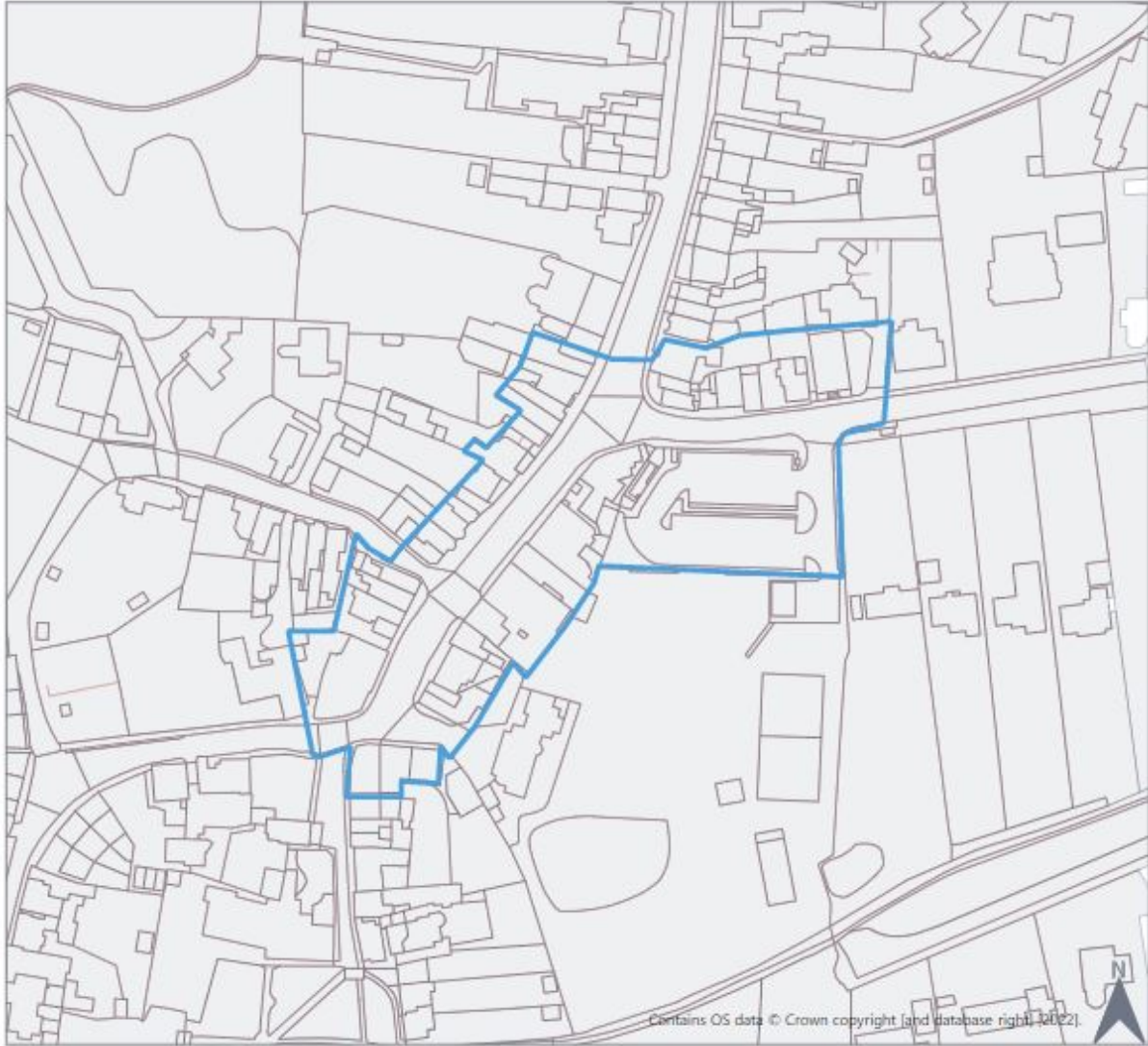


Crawley Down Village Centre



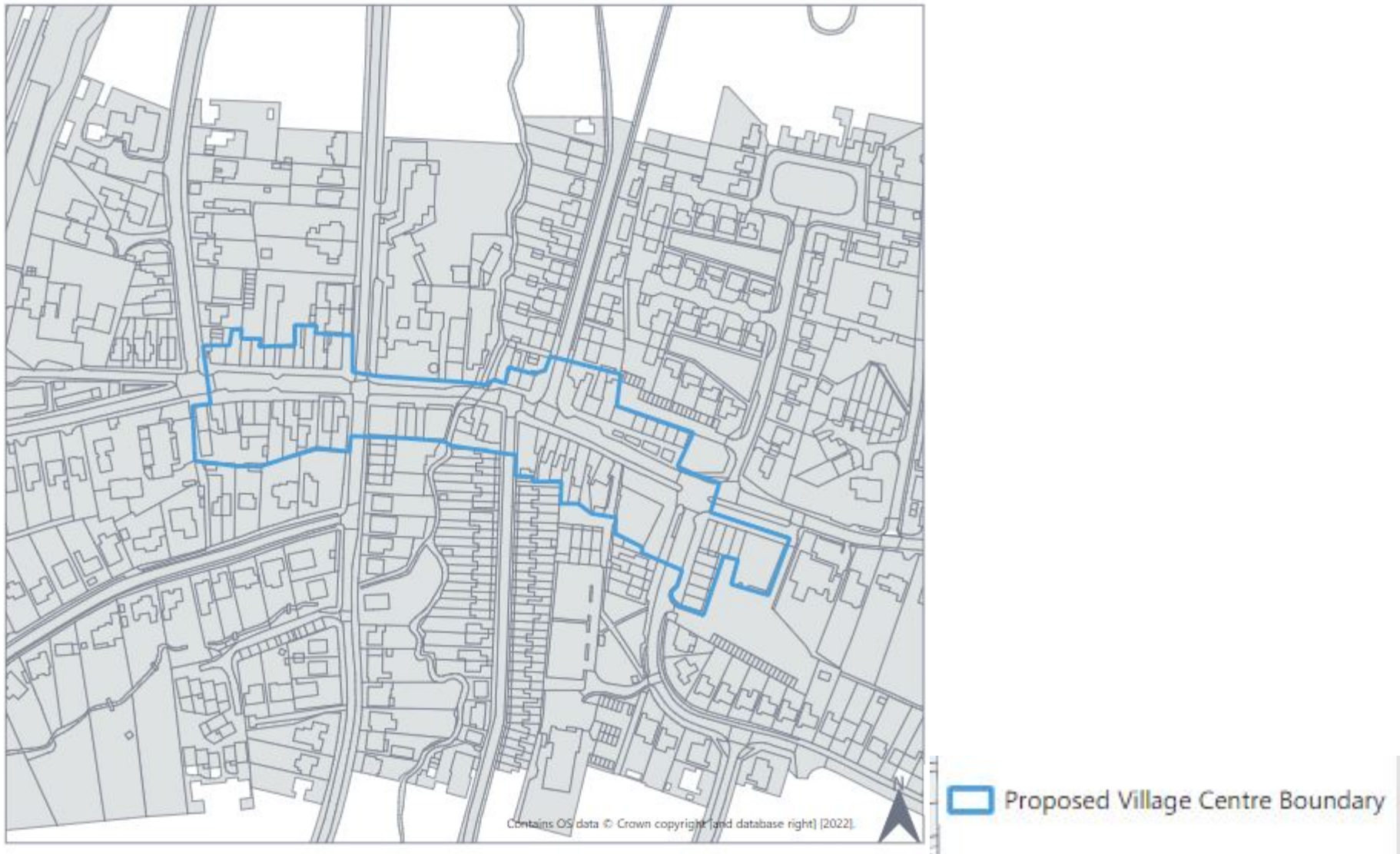
 Proposed Village Centre Boundary

Cuckfield Village Centre

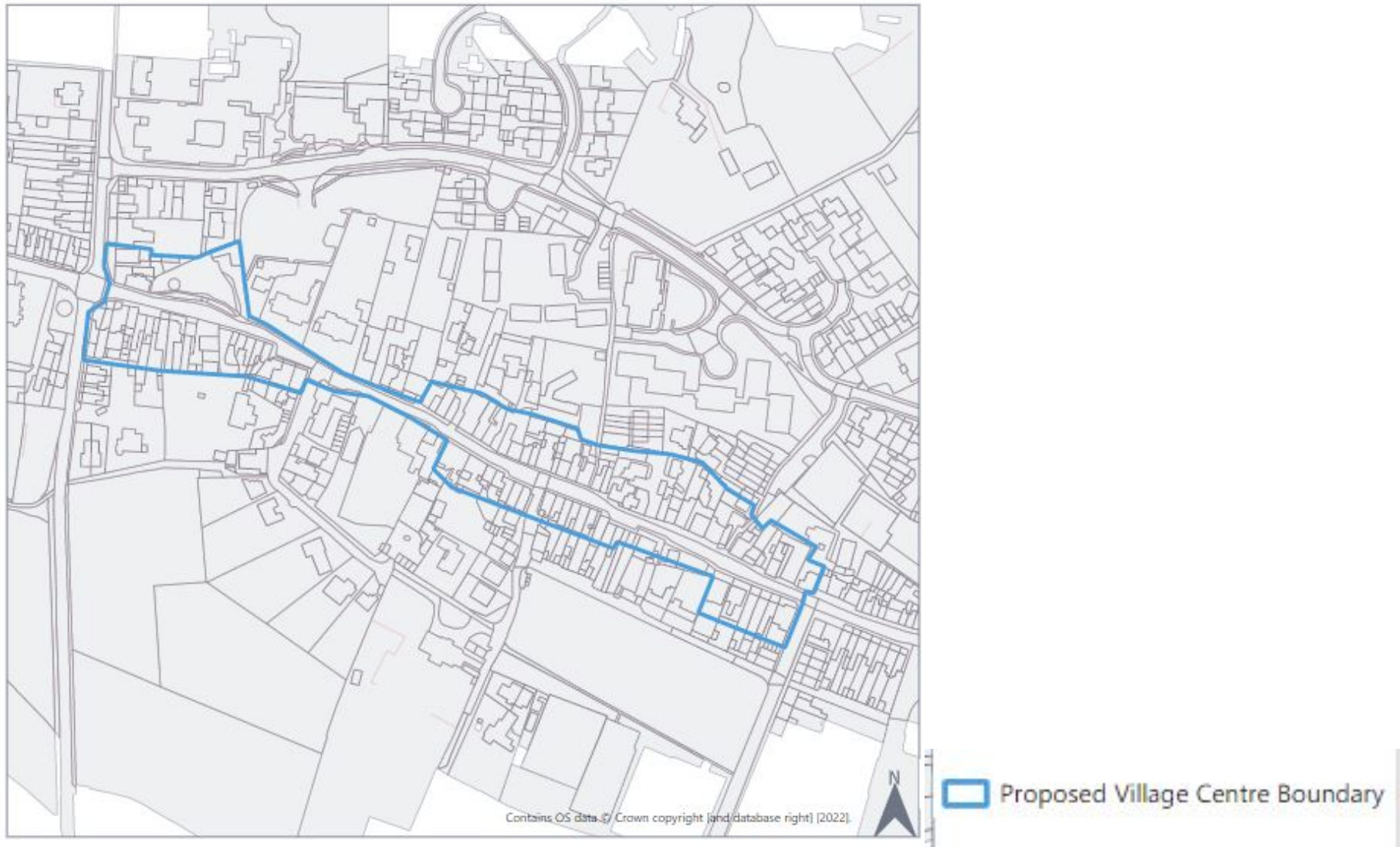


Proposed Village Centre Boundary

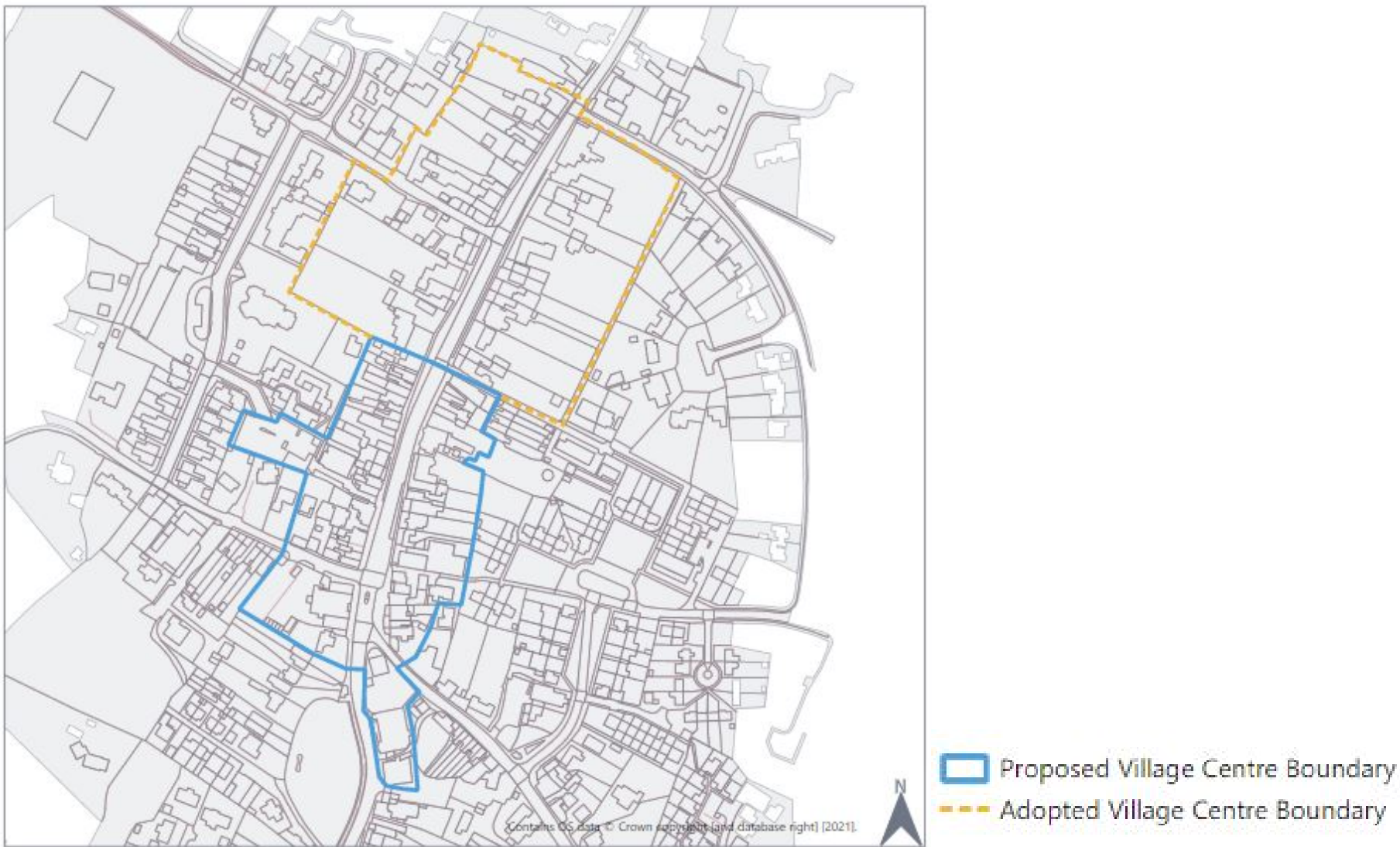
Hassocks Village Centre



Hurstpierpoint Village Centre



Lindfield Village Centre



Appendix 3: Policy DPI7: Viability supporting tables

Information Requirements for Viability Appraisal

Table 1 – Viability Appraisal information and data. The planning application Viability Appraisal should contain as a minimum the following information and data, which should be read in conjunction with Planning Practice Guidance.

	Information / data required	Notes
Appraisal format	<ul style="list-style-type: none"> Printed and electronic version of appraisal in a format that can be fully tested and interrogated Methodology utilised for the appraisal including details of any appraisal software or toolkits used 	
Scheme details	<ul style="list-style-type: none"> Gross and net site area and densities Residential unit numbers, sizes and types of units including a policy compliant split between private and affordable tenures Floor areas: <ul style="list-style-type: none"> Residential: Gross Internal Area (GIA) and Net Saleable Area (NSA) Commercial / Other: Gross Internal Area (GIA) and Net Internal Area (NIA) Proposed specification for each component of development, consistent with assumed costs and values, and target market / occupiers 	
Development programme	<ul style="list-style-type: none"> Project plan, including land acquisition, pre-build, construction and marketing periods and phasing where appropriate Viability cash flow where possible: The timing of cost and income inputs (including interest rates, capitalisation rates, loan costs residential sales rates with reference to project / construction plans and contracts and land / development / letting agreements as relevant). 	
Gross Development Value A	<ul style="list-style-type: none"> Anticipated residential Sales Values, ground rents, sales rates (per month), assumptions regarding forward sales and supporting evidence Anticipated rental values, yields and supporting evidence Details of likely incentives, rent-free periods, voids for any commercial element Anticipated value (and timing of payments) of affordable units based on evidence including details of discussions with Registered Providers and Registered Providers offers 	<ul style="list-style-type: none"> Assumptions relating to development values should be justified with reference to up to date transactions and market evidence relating to comparable new build properties within a reasonable distance of the site, and, where relevant & possible, arrangements with future occupiers. Information relevant to comparable properties should be fully analysed to demonstrate how this has been interpreted and applied to the application scheme. Viability Appraisals should be informed by discussions with a Registered Provider of affordable housing – providers may be able to indicate their likely offer prices Affordable housing values assumed within a Viability Appraisal should reflect the offer/s made by Registered Providers for purchasing the affordable housing

		<p>element of the development and evidenced. Where input is not available, information on rents, management and repair costs, voids, yields / payback period requirements should be submitted. For Shared ownership - % share and rent level on retained equity should be included. Estimated % market value (MV) and £/sq. m indications are also useful benchmarks helping inform a view on the revenue assumptions.</p>
Costs	<ul style="list-style-type: none"> • Build Costs per square metre based on RICS Build Costs Information Service (BCIS), with values correctly reflecting the specific proposal, and justified to show that an appropriate and reasoned approach has been taken in estimating the costs • Abnormal or exceptional costs not reflected in the land value/ price (and detailed reasons why this was not the case) • Where applicants seek to rely on a specific assessment of Build Costs rather than a recognised publicly available source of information (likely to be the case for larger schemes): expected build cost and supporting evidence including a fully detailed elemental cost plan demonstrating the basis of cost estimations and evidence of contractor costs. • Disaggregated abnormal costs (if relevant) that can be benchmarked against BCIS • Details of other costs such as demolition and supporting evidence including clarity on any additional assumptions such as those relating to external / site works 	<ul style="list-style-type: none"> • Development costs adopted within Viability Appraisals should be determined based on current day figures at the point of the planning application submission. • The RICS Build Costs Information Service (BCIS) is a publicly available source of cost information which can be used in Viability Appraisals. The selection of BCIS values must correctly reflect the specific nature, location and size of proposal, and be justified to show that an appropriate and reasoned approach has been taken in estimating the costs. • Abnormal costs should come with an explanation of the need / relevance and cost estimate information / reasoning for the assumed cost levels • It should not be assumed that abnormal costs would necessarily be borne exclusively at the expense of compliance with the Development Plan, as a site involving abnormal development costs is likely to attract a lower land value than could be achieved on a site where this was not the case. • Where a specific assessment of Build Costs is relied on, rather than standardised costs from a recognised source, or where any abnormal costs are applied, Build Costs will be reviewed on an open book basis as a part of a viability review. Costs should be provided for different components of the scheme including market and affordable housing. • The District Council will expect a clear correlation to be evident between a development's specification, assumed Build Costs and development values.
Fees	<ul style="list-style-type: none"> • Sales / letting and professional fees and supporting evidence 	<ul style="list-style-type: none"> • Build; sales / marketing costs
Developer profit	<ul style="list-style-type: none"> • Profit on cost or value 	<ul style="list-style-type: none"> • In accordance with the NPPG the District Council will avoid a rigid approach to

	<ul style="list-style-type: none"> Supporting evidence from applicants to justify proposed target rates of profit taking account of the individual characteristics of the scheme 	<p>profit levels. The District Council will consider the individual characteristics of each scheme when determining an appropriate profit level and will require supporting evidence from applicants and lenders to justify why a particular return is appropriate, having regard to site specific circumstances, market conditions and the scheme's risk profile.</p> <ul style="list-style-type: none"> The appropriate level of Developer profit will vary from scheme to scheme. This is determined by a range of factors including property market conditions, individual characteristics of the scheme, comparable schemes and the development's risk profile. The lower the scheme's risk profile, the lower the level of required profit and vice versa. Profit requirements for affordable housing are generally much lower than those for market sale units given the lower levels of risk associated with securing occupation of affordable units compared with the sale of market units. Assumptions made must be balanced and internally consistent. In line with this, it should be made clear how the profit level has been adjusted taking into account the other assumed inputs within an appraisal. For example, where a high build cost contingency or other costs at the upper end of typical parameters are adopted as a means of mitigating risk, this would equally be expected to influence the assumed profit target. The District Council expects that the actual Developer return which is produced as part of the applicant's submitted Viability Appraisal should form the profit threshold (rather than a higher figure) and be regarded as a reasonable return for the applicant. The most common approach for calculating Developer's profit in Viability Appraisals submitted as a part of the planning process is either as a factor of Gross Development Cost (GDC) or Gross Development Value (GDV)
<p>Benchmark land value</p>	<ul style="list-style-type: none"> Existing Use Value (EUV) based on evidence including existing income, comparable data and details of condition of existing site. Justification for any alternative land use value / 	<ul style="list-style-type: none"> Land value should reflect policy requirements, planning obligations, and CIL charges if applicable in the future A market value approach may not be appropriate if schemes evidenced are not policy compliant. Where these

	<p>premium applied over EUV, taking account of circumstances of site and planning policy together with this policy</p> <ul style="list-style-type: none"> • Freehold/leasehold titles • Tenancy schedule - to include lease summaries (where appropriate) • Details of income that will continue to be received over the development period (where appropriate) • Arrangements between the landowner and Developer, including any land sale, development or tenancy agreements (where appropriate) • Evidence for how benchmark land value reflects planning policy 	<p>concerns are evident the District Council will rely on the Existing Use Value / Existing Use Value plus a premium approach applying the guidance set out in this document.</p> <ul style="list-style-type: none"> • Lower levels of affordable housing should only be tested in addition to a policy compliant scheme where warranted by genuine site specific viability constraints (including where an acceptable benchmark land value cannot be achieved) • An Alternative Use Value benchmark land value will only be accepted where there is a valid consent for the alternative use or if the alternative use would clearly fully comply with the Development Plan. • In any event bearing in mind that land can be overpaid for – a historic or actual site purchase may not be a good indicator of current site value
Planning Contributions	<ul style="list-style-type: none"> • Planning obligation costs • Any Community Infrastructure Levy if adopted in future 	<ul style="list-style-type: none"> • Likely planning obligations (and CIL if adopted in the future) should be included as a development cost in a Viability Appraisal • The timing and level of planning obligations that can be supported as a part of the Viability Appraisal process will be considered. Where these are necessary to make the development acceptable in planning terms however, and these cannot be secured, planning permission will not be granted. • Any CIL instalment policy (if adopted) should be reflected in assumed timings of payments.
Development finance	<ul style="list-style-type: none"> • Finance costs appropriate to the type of proposal, reflecting the fact that finance costs vary throughout the development period, with the majority of interest costs typically incurred during construction and bearing in mind the assumed land purchase timing(s) 	<ul style="list-style-type: none"> • A standardised approach will generally be adopted to finance costs, which should be appropriate to the type of proposal. • The viability model should reflect the fact that finance costs vary throughout the development period, with the majority of interest costs typically being incurred during construction.
Other	<ul style="list-style-type: none"> • A statement to verify the accuracy of the information submitted and that no incentives are being paid • Other information requested by the District Council having regard to the specific application • Depending on individual site circumstances further information may be required which may include: <ul style="list-style-type: none"> ○ Developers market analysis report; ○ Details of company overheads; ○ Copy of financing offer / letter; 	

	<ul style="list-style-type: none"> ○ Copy of cost plan; ○ Board report on scheme; ○ Letter from auditors concerning land values and write offs; ○ Sensitivity analysis showing different assumption options (e.g. low, medium and high scenarios).
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Advanced Stage Viability Review

Table 2 – The information required for the Advanced Stage Viability Review

The following information & data is required as evidence during the Advanced Stage Viability Review:

	Information / data required	Notes
Gross Development Value A	<p>Gross Development Values (GDV) - all gross receipts or revenue received supported by evidence, including but not limited to:</p> <ul style="list-style-type: none"> • Audited company accounts detailing all sold/ let transactions • Certified sales contracts or completion certificates detailing the purchase price for each sale • Land Registry records showing sale price information • Other receipts, such as income from hoardings 	
Estimated GDV	<p>Estimated GDV for the unsold/ unlet components of the development at the point of review using detailed comparable information taking into account:</p> <ul style="list-style-type: none"> • Any sales/ lettings that have taken place on the development • Income from any other sources. 	
Average residential values per sq. m	<p>Average residential values per sq. m for market and affordable housing across the scheme based on the information provided above</p>	
Actual Build Costs incurred	<p>Payments made or agreed to be paid under the relevant building contract(s), including receipted invoices, or costs certified by the Developer's quantity surveyor, cost consultant or employers agent.</p>	<p>This is not required at planning application stage where Build Costs are based on relevant (index linked) BCIS figures</p>
Estimated Build Costs	<p>Estimated Build Costs to be incurred for the remainder of the development based on the agreed building contract(s) or estimation provided by</p>	<p>This is not required at planning application stage where Build Costs are</p>

	the Developer's quantity surveyor, cost consultant or employers agent	based on relevant (index linked) BCIS figures
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Table 3 - The Advanced Stage Viability Review Contribution Formula

The formula to be used at the Advanced Stage Viability Review to calculate any additional financial contribution payable towards infrastructure contributions and affordable housing provision which was not viable at planning application stage

<p>'Contribution' = $((A + B - C) - (D + E - F)) \times \text{APA}$</p> <p>A = Gross Development Value (GDV) achieved on sale/letting of 75% of residential units and GDV from other parts of the development sold / let and other income receipts *</p> <p>B = Estimated GDV for parts of the development that are yet to be sold / let and other income sources *</p> <p>C = GDV determined as part of the assessment of viability at planning application stage</p> <p>D = Actual Build Costs incurred at point of review *</p> <p>E = Estimated Build Costs for remainder of the development *</p> <p>F = Total Build Costs determined as part of the assessment of viability at planning application stage</p> <p>Notes:</p> <p>(A + B - C) is the change in GDV at the point of review</p> <p>(D + E - F) is the change in Build Costs at the point of review, which is subtracted from the change in GDV to establish whether additional value has been generated as a result of increased values or reduced Build Costs</p> <p>APA = 0.60 calculates the reduction in the contribution required, accounting for the 40% of additional value to be retained by the Developer as an additional profit allowance</p> <p>* Determined as part of the Advanced Stage Viability Review</p>

This formula will be used to calculate whether a 'surplus' is generated, due to the scheme being more financially viable than previously anticipated, by deducting any change in Build Costs from any change in Gross Development Value.

The change in Gross Development Value is calculated by adding together the actual Gross Development Value achieved at the date of review and the estimated Gross Development Value due and deducting from this the Gross Development Value determined as part of the assessment of viability at the planning application stage. The change in Build Costs is calculated by adding together the actual Build Costs incurred at the point of review and the estimated Build Costs due and deducting the total Build Costs determined as part of the assessment of viability at the planning application stage

GUIDANCE NOTE

Methodology

Any additional land value provided by a development over and above the value of the site in its existing use, or an accepted policy compliant alternative use, is dependent on the grant of planning permission, the basis of which is compliance with the Development Plan. Landowner expectations and speculation on land values need to be balanced against the legitimate needs of communities accommodating new development, including the provision of affordable housing and infrastructure.

The Residual Land Value methodology will be used when assessing the viability of schemes since it is consistent with the longstanding principle that policy requirements associated with securing planning permission are development costs that influence the level of any uplift in land value from the grant of planning permission or change of use of land for development.

It determines the 'residual' value that is left available to pay a landowner for their land, once the costs of development (and a reasonable profit for the Developer) are deducted from the gross development value generated by the development. This is then compared with the benchmark land value based on the existing use value or alternative use value of the site.

Existing use value is defined as the value of the site in its existing use, assuming that it remains in such use and has planning permission where necessary for that use. It excludes any hope value associated with proposed development on the site or potential alternative uses. Market transactions used to justify an existing use value must be genuinely comparable to the application site and should relate to sites and buildings of a similar condition and quality, or otherwise be adjusted accordingly.

A premium may be added to the Existing Use Value where justifiable, in order to provide a relevant incentive for the landowner to release the land for development.

An alternative Use Value approach to the benchmark land value will only be accepted where there is an existing implementable permission for that use or the alternative use would fully comply with the Development Plan, and the value attributed must take account of all policy requirements including affordable housing and infrastructure contributions.

If a proposal generates sufficient positive land value after also supporting a suitable level of profit as well as necessary development costs and planning obligations (ie the Residual Land Value is higher or equal to the Benchmark Land Value) it will generally be capable of implementation from a viability point of view. If not, the proposal may not go ahead, unless there are alternative funding sources to 'bridge the gap' or other compelling drivers for it to progress.

Transparency

It is common practice for applicants to seek to place confidentiality restrictions on viability information, normally as a request for exemption from disclosure under the Environmental Information Regulations 2004 and the Freedom of Information Act 2000, on the basis that this would adversely affect the confidentiality of commercial information which protects a legitimate economic interest.

The District Council recognises the importance of public participation and the availability of viability information in the planning process to District Councillors, officers and consultees. The District Council considers that disclosure would not cause an 'adverse effect' which would outweigh the public benefit of such an action; and that information submitted as a part of, and in support of a Viability Appraisal should be treated transparently and be available for wider scrutiny. In submitting information, applicants should do so in the knowledge that this will be made publicly available alongside other application documents on the public planning register.

Redaction of any information will only be allowed in exceptional circumstances. Applicants wishing to make a case for exceptional circumstances will be required to provide full justification as to the extent to which the disclosure of a specific piece of information would cause an 'adverse effect' and harm to the public interest, to an extent not outweighed by the benefits of disclosure to the public.

The District Council will consider the matter of redaction carefully, with reference to the 'adverse effect' and overriding 'public interest' tests in the Environmental Information Regulations, as well as the specific circumstances of the case. Such issues should be raised at an early stage within the preapplication process. Any justification provided as to the extent of harm which would occur if the information was disclosed will also be placed on the public planning register, irrespective of whether or not accepted.

Annex 1: Overview of Policy Requirements for Housing Allocations

Allocations within the District Plan must be compliant with the development plan when read as a whole; this includes national policy, policies within this plan (including DPH4: General Principles for Housing Allocations and individual allocation policies), and within 'made' Neighbourhood Plans.

The following is a non-exhaustive overview of other development plan policies that will need to be taken into consideration:

Key Objectives

- Contribute towards necessary infrastructure provision, including transport, education, health, community and leisure facilities as required by District Plan Policy **DPI1: Securing Infrastructure**, the **Mid Sussex Infrastructure Delivery Plan (IDP)** and the **Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (SPD)**.
- Provide 30% affordable housing and a suitable mix of housing in line with District Plan Policies : **Housing Mix** and **DPH37: Affordable Housing** and the **Mid Sussex Affordable Housing SPD**.

Urban design principles

- Design new development in accordance with District Plan Policy **DPB1: Character and Design** and with the design principles set out in the **Mid Sussex Design Guide SPD**.
- Design sites within the High Weald AONB regarding accordance with the **High Weald Housing Design Guide**.

Landscape considerations

- conserve and enhance the natural beauty of the High Weald, as set out in the **High Weald Management Plan 2019-2024** and District Plan Policy **DPC4: High Weald Area of Outstanding Natural Beauty**.
- Development within the setting of the South Downs National Park will need to be consistent with National Park purposes and special qualities, as set out in the **South Downs Local Plan** and **South Downs Partnership Management Plan** and with District Plan Policy **DPC5: Setting of the South Downs National Park**.

Social and community

- Contribute towards education capacity (early years, special education needs, primary, secondary and sixth form) in accordance with District Plan Policy **DPI1: Securing Infrastructure**, the **Mid Sussex Site Allocations IDP** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.
- Contribute towards public open space, recreational and community facilities in accordance with District Plan policy **DPI5: Leisure and Cultural facilities**, **DPI6: Community Facilities and Local Services**, the **Mid Sussex Site Allocations IDP**, the **Draft Mid Sussex Play and Amenity Greenspace Strategy**, **Draft Playing Pitch Strategy**, **Draft Community Buildings**

Strategy and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.

- Contribute towards health care provision, where appropriate, in accordance with District Plan Policy **DPI1: Securing Infrastructure** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.

Historic environment and cultural heritage

- Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies in accordance with District Plan policies **DPB2: Listed Buildings and other Heritage assets**, **DPB3: Conservation Areas** and **DPN5 Historic Parks and Gardens**.

Air Quality, Light, Noise and Amenity

- Investigate any potential adverse air, light and noise pollution impacts from the development itself and from neighbouring uses, ensuring that these are avoided, or appropriately mitigated, in accordance with District Plan Policy **DPN6: Noise, Air and Light Pollution** and **DPN9 relating to Air Quality**

Biodiversity and Green Infrastructure

- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy **DPN1: Biodiversity**.

Access and highways

- contribute towards delivering sustainable development and appropriate infrastructure in accordance with District Plan Policy **DPT1: Transport** and the objectives of the **West Sussex Transport Plan 2011 – 2026**.
- Provide adequate car parking in accordance with District Plan Policy **DPT1: Transport**.

Flood risk and drainage

- use Sustainable Urban Drainage Systems (SuDS) principles and methods where possible to drain the surface water from the development. SuDS features shall be designed and managed to provide, where possible, an ecological and water quality enhancement, providing areas for amenity and recreation, in accordance with District Plan Policy **DPS4: Flood Risk and Drainage** and the **West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water** and the **Mid Sussex Drainage Advice for Developers**.

Ashdown Forest

- Developments resulting in a net increase in dwellings within the 7km zone of influence around the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) will require mitigation in order to prevent adverse effects on the Forest and shall accord with District Plan Policy **DPC6: Ashdown Forest SPA and SAC**.

Utilities

- Demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users in accordance with District Plan policy **DPS5: Water Infrastructure and the Water Environment**.

Sustainability

- Address sustainability at the conception stage of development proposals to exploit the benefits of passive design and orientation, fabric performance, energy efficiency measures and low carbon solutions; and wherever possible include on-site low or zero carbon technologies in accordance with District Plan policies **DPS2: Sustainable Design and Construction** and **DPS3: Renewable Energy Schemes**.
- Design development to be resilient to climate change, minimise energy and water consumption and mitigate against flood risk in line with **DPS2: Sustainable Design and Construction**, **DPS4: Flood Risk and Drainage** and **DPS5: Water Infrastructure and the Water Environment**.

MID SUSSEX NET ZERO TARGETS

REPORT OF: DEPUTY CHIEF EXECUTIVE
Contact Officers: Sally Blomfield, Assistant Director Planning and Sustainable Economy
sally.blomfield@midsussex.gov.uk
Wards Affected: All
Key Decision: Yes
Report to: Scrutiny Committee for Housing, Planning, Economic Growth and Net Zero
5th October 2022

Purpose of Report

1. In accordance with the objectives of the Mid Sussex Sustainable Economy Strategy (April 2022) officers have been working with specialist consultants to prepare the evidence base to inform net zero targets for both the Council and District. The purpose of this report is to request the Scrutiny Committee to consider the evidence base (attached in Appendix 1) and the proposed net zero targets.

Summary

2. This Report:
 - Summarises the purpose of setting net-zero targets and their links to the Sustainable Economy Strategy and Action Plan (2022-2025);
 - Describes the process of preparing the net-zero target recommendations, including preparation of the evidence base;
 - Summarises the recommended net zero targets and the justification for these; and
 - Sets out next steps to achieving delivery of the proposed targets.

Recommendations

3. That the Scrutiny Committee:
 - (i) **Considers and comments on the following recommended net zero targets:**
 - a. **A District-wide net zero target aligned to the national target.**
 - b. **A Council-only net zero target of 2040 for emissions the Council can directly control.**
 - c. **A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.**
 - (i) **Recommends to Council that the recommended net zero targets be approved.**

Background

4. In June 2019 the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target will require the UK to bring all greenhouse gas emissions to net zero by 2050.
5. Net zero means achieving a balance between the greenhouse gases emitted into the atmosphere and the greenhouse gases removed from the atmosphere. If the emissions and removals balance out, net-zero has been achieved.
6. In August 2021 Mid Sussex District Council appointed specialist consultants Ricardo AEA to undertake a detailed analysis of carbon emissions and net zero target options for both the Council and the wider District of Mid Sussex. This evidence base will enable Councillors to make an informed decision when committing to a net zero target for both the Council and District.

7. A cross party Member working group consisting of eight Members drawn from the Scrutiny Committee was established to lead and inform the development of the draft Sustainable Economy Strategy (SES). SES Objectives and Actions will support delivery of net zero. Due to the close links to the SES, this working group also provided leadership on the initial stages of the carbon emissions and net zero target options analysis.
8. In January 2022 Ricardo presented the initial findings of their analysis to the working group. This presentation focused on the analysis of the Council and District-wide carbon emissions baseline.
9. In April 2022 the Council approved the Sustainable Economy Strategy and Action Plan (2022-2025) to support sustainable economic growth in Mid Sussex. This included Objective 13: Reduction in Carbon Emissions and 7 actions to achieve this Objective in the short and long term. One of the actions was to use the Ricardo analysis to create a Mid Sussex Net Zero Carbon Programme. The first step in delivering this action is to agree net zero target dates at both a Council and District-wide wide level.

Development of the Targets

10. In line with industry best practice, the development of a net zero carbon programme follows three stages, the first two of which are now complete:
 - (i) Carbon Emissions Baselineing: Identify how much carbon is emitted and from which sources.
 - (ii) Carbon Pathway Modelling: Identify the technical feasibility of transitioning to carbon net zero by a hypothetical target date or dates.
 - (iii) Action Planning: Identify the actions required to achieve net zero by the target date agreed by the Council.
11. Ricardo has completed the Baselineing work (Stage i) and the Pathway Modelling work at both a Council-only and District-wide level (Stage ii). Ricardo has submitted the final version of their analysis in the Net Zero Carbon Emissions Feasibility and Options Report. The report features the completed analysis undertaken in Stages (i) and (ii) and is attached as Appendix 1.
12. In September 2022 Ricardo presented the analysis of the Council and District-wide carbon reduction pathway to Councillors in a briefing. Officers presented the recommended net zero targets in the same briefing. This enabled all Councillors to understand the evidence base and rationale.
13. Ricardo has modelled the technical feasibility of transitioning to net zero by a 2040 and 2050 hypothetical net zero target date. In addition, and again in line with good practice, Ricardo reviewed the implications for a business as usual (or do-nothing) approach.
14. Stage (iii) cannot begin until the Council has agreed a net zero target.

Carbon Net Zero Target Recommendations

15. The Net Zero Carbon Emissions Feasibility and Options Report identifies, at both a Council and District-wide level, that a 2050 target is technically feasible, but delivery is heavily reliant on external factors.
16. The Report identifies, at both a Council and District-wide level, that a 2040 target is also technically feasible, but the pace of change is significantly increased and successful delivery is again heavily reliant on external factors which are not within this Council's control.
17. It is important to note that when assessing technical feasibility, the carbon pathway models make the following necessary assumptions:

- (i) That the necessary funding and resources (e.g. a skilled supply chain) are available.
- (ii) That the Government's future net-zero legislation happens on-time and has the anticipated impact.
- (iii) That key low-carbon technologies and fuels are proved feasible, commercially viable and become widely available.
- (iv) No unforeseen major events occur that changes the political calculus.

18. When creating the net zero target recommendations, Officers have considered a wide range of issues that could impact deliverability. The key consideration being that the Council only directly controls a very small percentage of its own carbon emissions (2.6%) and an even smaller percentage of the District's emissions (0.03%).

19. Therefore, the Council is heavily reliant on national legislation to successfully achieve net zero. While that national legislation is being phased in over future years, the Government's target is currently 2050. Officers would not recommend that the Council adopts an earlier target for emissions it has no control over as changes at a national level would significantly impact the deliverability of such a target.

20. Officers therefore recommend the following net zero targets:

- (i) A District-wide net zero target aligned to the national target.
 - a. This target is recommended because:
 - i. MSDC only directly control 0.03% of the Districts emissions
 - ii. In most areas MSDC can showcase/influence but rarely exert direct control.
 - iii. The Government has committed to a 2050 national target.
 - iv. The most impactful net-zero policy is controlled nationally.
 - v. It is sensible to align to the national net-zero target.
 - vi. The pathway analysis suggests that a 2050 target is feasible.
 - vii. The scope of change is massive, as is the potential cost to the District ¹.
- (ii) A Council-only net zero target of 2040 for emissions the Council can directly control.
 - a. This target is recommended because:
 - i. The pathway analysis suggests that a 2040 target is feasible for direct emissions.
 - ii. MSDC can control its direct emissions.
- (iii) A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.
 - a. This target recommended because:
 - i. The pathway analysis suggests that a 2050 target is feasible.
 - ii. The emissions are outside MSDC's direct control and are therefore included in the District target.
 - iii. They represent 97% of MSDC's carbon emissions. 84% of that 97% are emitted from goods and services the Council buys through a Shared Procurement Service.

¹ As a reference point, Lambeth Council commissioned a study from the Carbon Trust to identify the cost of decarbonising the heating of all buildings in Lambeth. The study forecasted a cost of ~£3 billion for 63,900 buildings. That was the optimal cost scenario. In that scenario resident energy bills were forecasted to decrease only marginally. To generate a meaningful energy bill saving for building occupiers would require major electricity grid upgrades, increasing the cost to ~£6 billion. The study is available here: <https://beta.lambeth.gov.uk/environmental-services/climate-change-impact-plans/heat-decarbonisation-study>

Next Steps

21. Ricardo has been commissioned to prepare an Action Plan (Stage iii of the work) which will be informed by the targets agreed by the Council in November. Once the Council has agreed the target dates Ricardo will be able to prepare the Action Plan.
22. The SES (Objective 13) includes an action to use the Ricardo analysis to create a Mid Sussex Net-Zero Carbon Programme. The preparation of the Programme will build on the Action Plan to create an operational, and internal delivery programme to help achieve the agreed net zero targets.
23. This SES identifies that this work will be complete by 2023.

Risk Management Implications

24. There are no risk management implications associated directly with this report.

Equalities Implications

25. An Equalities Impact Assessment has been completed and can be found in Appendix 2.

Sustainability Implications

26. These net zero target recommendations have been created with the aim of reducing the carbon emissions of both the Council and the District as part of the UK Government's strategy to combat climate change.

Financial Implications

27. The budget for the Ricardo work was £50,940 and this will cover stages i, ii and iii identified in paragraph 13.
28. Ricardo has also been commissioned to undertake a deep-dive analysis of the Council-only emissions from procured goods and services that can only be indirectly influenced. These emissions make up a large percentage (~80%) of the Council's emissions but cannot be directly controlled by the Council. Therefore, additional analysis is required to help inform how the Council can most effectively influence its supply chain.
29. The cost of this additional commission is £11,015 and will be funded by the Sustainability Climate Change Reserve.
30. To track carbon reduction progress, it will be necessary to periodically re-baseline both the Council-only and District-wide emissions. The indicative costs and frequency are set out below:
 - (i) Council-only (directly controlled): once a year = £1,500
 - (ii) Council-only (indirectly influenced): every two years = £8,500
 - (iii) District-wide: every three years = £1,500
31. Therefore, the indicative total cost to the Council for the next three years is £14,500. A budget for this work will be included in the Council's budget in coming years.

Background Papers

32. Appendix 1: Net Zero Carbon Emissions Feasibility & Options Report For Mid Sussex (Ricardo)
33. Appendix 2: Net Zero Target Policy Equality Impact Assessment



NET ZERO CARBON EMISSIONS

Feasibility and options

Report for: Mid Sussex District Council

Ricardo ref. ED15049

Issue: 3

20 September 2022

Customer:

Mid Sussex District Council

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1 INTRODUCTION

1.1 BACKGROUND

Mid Sussex District Council (MSDC) is looking to understand the implications of the net zero carbon agenda for the district and the delivery of council services. It has commissioned Ricardo Energy & Environment to carry out a feasibility study to provide the evidence needed to understand the scale of the challenges and the key actions required to achieve net zero, both for the council's own emissions and for the district as a whole. The first step in this work is to carry out an assessment of current greenhouse gas (GHG) emissions, both for the Council's own emissions and for emission across the whole District. An influence mapping exercise was carried out that looked at the drivers of GHG emissions and which organisations/teams could influence them. A set of net zero pathways were then developed that showed how the Council's own emissions, and emissions across the whole district, could be reduced to net zero. A plan was then prepared, indicating the actions that need to be taken to deliver this, who needs to take them and by when.

1.2 DEFINITIONS AND SCOPE

Net zero, also known as carbon neutrality, simply means achieving a balance between emissions of GHGs to the atmosphere and removals of GHGs (mainly CO₂) from the atmosphere, for example by nature-based solutions such as tree planting or by technological means such as carbon capture and storage (CCS). If the emissions and removals balance out, carbon neutrality has been achieved.



When looking at the emissions side of the equation, we are considering all GHGs, so not just carbon dioxide from combustion of fuels, but also other gases such as methane emissions from waste or nitrous oxide emissions from agriculture.

1.3 REPORT STRUCTURE

This report considers net zero for both the Council's own GHG emissions and for the GHG emissions across the whole district. Chapters 0 and 3 look at GHG emissions from the Council's own activities and from across the whole district respectively, setting out what latest emissions are, what the key drivers of emissions are and developing a couple of net zero scenarios for both levels. Chapter **Error! Reference source not found.** then sets out a plan and routemap for net zero for both the Council's own emissions and the emissions across the whole district, detailing who should do what, by when to deliver it.

2 A NET ZERO COUNCIL

This section looks at GHG emissions for the Council. It starts with the GHG baseline for the Council's activities, then considers which stakeholders have influence over emissions and finishes by outlining two possible net zero pathways that the Council could take.

2.1 GHG BASELINE

2.1.1 Definitions and scope

A GHG baseline was developed for the Council's own emissions in the financial year 2019/20. This was the latest year for which data was available and has the additional benefit that it provides a recent picture of emissions that is relatively unaffected by the Covid-19 pandemic, and therefore reflects typical activity levels as closely as possible. The inventory has been produced covering scopes 1, 2 and 3 as set out in the World Resources Institute's 'GHG Protocol Corporate Accounting and Reporting Standard'¹. It therefore includes:

- Scope 1 (direct emissions): Emissions produced from sources linked to a company's assets.
- Scope 2 (indirect emissions): Emissions produced by the generation of electricity purchased from third parties and consumed in the company's assets.
- Scope 3 (indirect emissions): Emissions that arise as a consequence of the activities of the company, but occur from sources not owned or controlled by the company.

The emissions sources that are included in these scopes depend on the specific methodology used. For this study we have used the concept from the GHG Protocol Corporate Accounting and Reporting Standard called 'Operational Control'. This is defined as:

"A company has operational control over an operation if the former or one of its subsidiaries has the full authority to introduce and implement its operating policies at the operation".

Ricardo often summarises this as: "Who has responsibility for making changes to improve the properties energy efficiency or performance?" This definition of "Operational Control" is important for MSDC when it comes to the reporting of emissions from an organisation's properties. Only the sites that MSDC have operational control over were included in the baseline assessment, meaning the following:

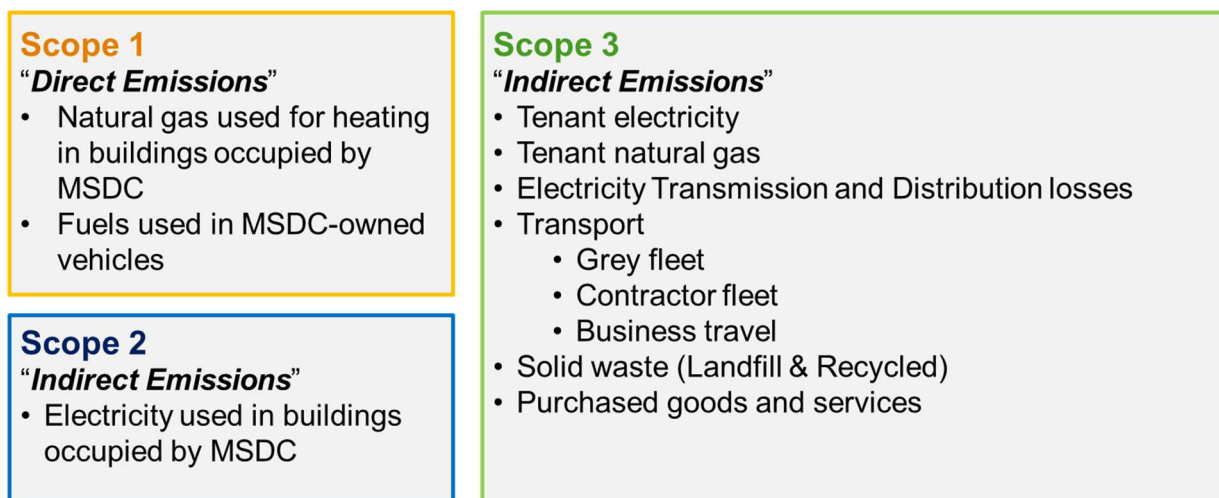
- Properties directly occupied/operated by MSDC will have their emissions reported as Scope 1 (for direct emissions) and Scope 2 (for indirect emissions) as MSDC have direct control over the energy/utilities used at these properties. This includes properties that are owned and occupied by MSDC and that are leased by MSDC from someone else.
- Properties that are not directly operated by MSDC (e.g., owned by MSDC but then tenanted or hired out) will have their emissions reported as Scope 3, as MSDC have indirect control over their emissions. In other words, the emissions are being produced by the tenants' activities, but MSDC can make changes to the properties to reduce these emissions.
- Properties that MSDC do not have operational control over (i.e., owned by MSDC but they are not responsible for making changes to the property to reduce emissions) have been excluded from the baseline assessment.

A complete list of MSDC's properties was compiled by MSDC's staff and their assignment to the above categories discussed with Ricardo.

What this means is that the following emissions sources were included in scopes 1, 2 and 3.

¹ <https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf>

Figure 1: scopes and emissions sources included in the GHG baseline assessment for Mid Sussex District Council



Mid Sussex District Council owns the head lease of Orchard Shopping Centre and is also the freeholder of the site. It was intended to include the emissions from gas and electricity consumption in common/landlord areas of the shopping centre in the Council’s emissions baseline. However, it has not yet been possible to get data to allow this. Should this data become available, the baseline emissions data could be updated accordingly in future.

Ricardo’s Net Zero Gap Analysis Tool (NZGAT) tool has been used for the council level assessment and so the approach was consistent with the district level assessment.

2.1.2 Baseline results

Looking at emissions under scopes 1, 2 and 3, scope 3 is by far and away the largest portion of GHG emissions, representing over 97% of total GHG emissions from the Council’s own operations, as shown in Table 1.

Table 1: MSDC total emissions summary

Scope	tCO ₂ e	% total
Scope 1	138	1.4%
Scope 2	114	1.2%
Scope 3	9,555	97.4%
Total	9,807	100.0%

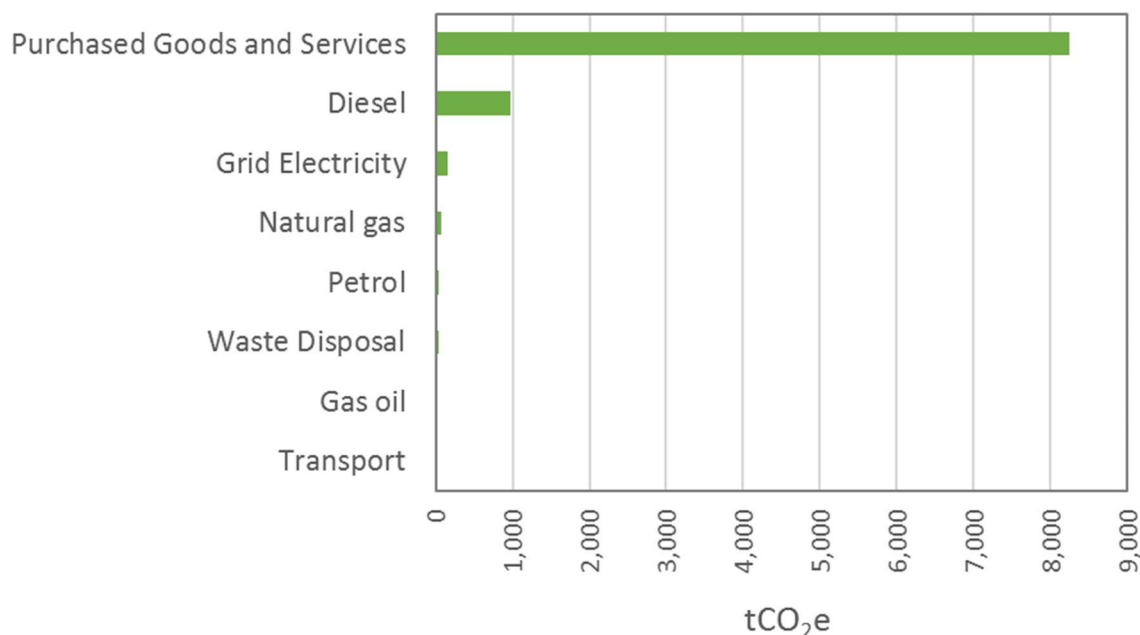
As can be seen in Table 2 and Figure 2, the majority of Scope 3 emissions come from “Purchased Goods and Services”. This means all upstream (i.e., cradle-to-gate) emissions from the production of products purchased or acquired by the Council. This includes maintenance of properties, purchases of electrical/IT equipment and paper. The emissions from purchased goods and services have been calculated from MSDC accounts records using an external tool. This methodology, although the best that is currently available, has inherent uncertainties in both the categorisation of expenditure into different broad categories, and is based on spend data from 2012 in the USA. As such, the resulting

emissions that are calculated need be used with caution and further work outside of the scope of this project is suggested to validate these figures. Therefore, Ricardo has been commissioned to undertake a deep-dive analysis of the Council-only Scope 3 emissions from procured goods and services. This work is ongoing and is not featured in this report.

Table 2: scope 3 emissions from MSDC

Emissions Source	Scope 3 emissions	%
Transport (<i>Business Travel Public Transport</i>)	4	0.0%
Gas Oil (<i>Contractor vehicles</i>)	25	0.3%
Waste Disposal	33	0.3%
Petrol (<i>Fleet and contractor vehicles</i>)	36	0.4%
Natural Gas	69	0.7%
Grid Electricity	160	1.7%
Diesel (<i>Fleet and contractor vehicles</i>)	977	10.2%
Purchased Goods and Services*	8,251	86.4%
Total (tCO₂e)	9,555	100%

Figure 2: scope 3 emissions from MSDC



The second most significant emissions source for scope 3 emissions is diesel used in contract fleet vehicles: Waste collection, grounds management and tree surgeons.

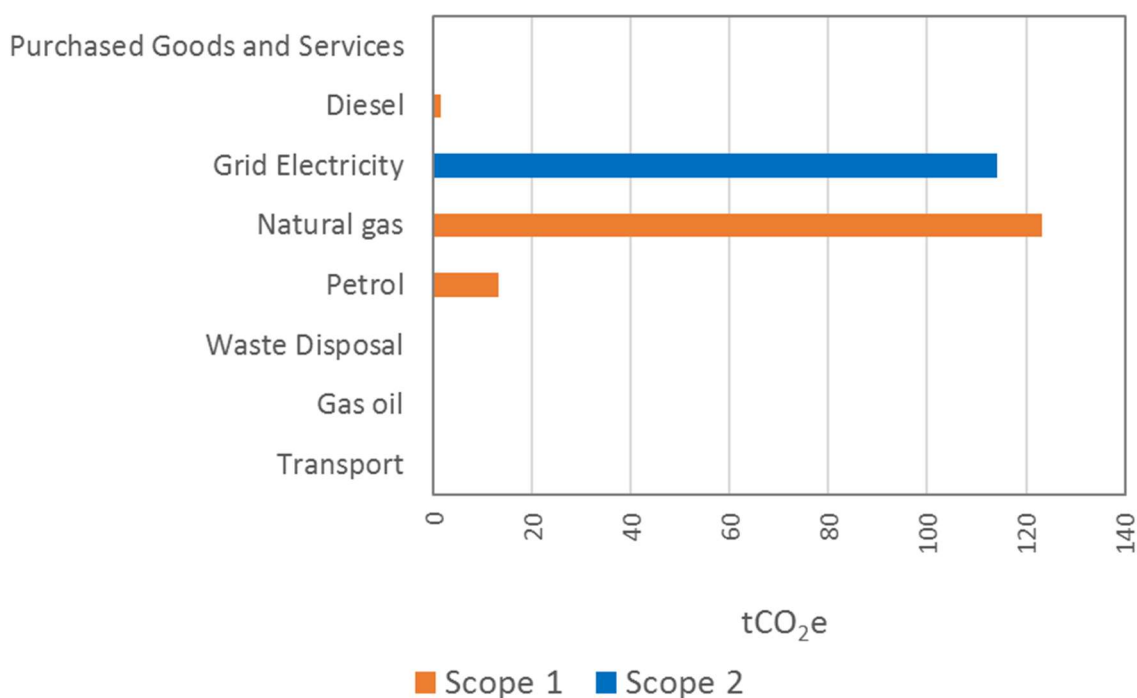
Focusing specifically on scope 1 and 2 emissions, Table 3 and Figure 3 show these emissions from the Council. It can be seen that most of the emissions are from use of natural gas in buildings (scope 1)

and use of electricity (scope 2), with a much smaller share coming from the Council’s fleet of vehicles. This therefore immediately gives a sense of the priorities for achieving net zero on the Council’s own estate, with a clear need for the focus to be on energy use in buildings.

Table 3: scope 1 and 2 emissions from MSDC

Emissions Source	Scope 1	Scope 2	Total	%
Transport (<i>Business Travel Public Transport</i>)	0	0	0	0.0%
Gas Oil (<i>Contractor vehicles</i>)	0	0	0	0.0%
Waste Disposal	0	0	0	0.0%
Petrol (<i>Fleet and contractor vehicles</i>)	13	0	13	5.2%
Natural Gas	123	0	123	49.2%
Grid Electricity	0	114	114	45.6%
Diesel (<i>Fleet and contractor vehicles</i>)	1	0	1	0.0%
Purchased Goods and Services*	0	0	0	0.0%
Total (tCO₂e)	136	114	250	100%

Figure 3: scope 1 and 2 emissions from MSDC



2.1.3 Conclusions and observations

Scope 1 & 2 emissions sources (under MSDC's direct control) make up ~3% of the total carbon footprint. Of these, the largest emissions sources are natural gas used in heating systems (49%) and grid electricity (46%) used in properties for which MSDC have "operational control". Therefore, these two emissions sources should be a focus for decarbonisation efforts as follows:

- To reduce emissions from natural gas, strategies involve encouraging the sustainable use of heating or implementing alternative renewable heat sources such as: Renewable biofuels, solar heating, geothermal heating, and heat pumps.
- There are multiple routes for reducing emissions from grid electricity, such as: Efficient HVAC (heating, ventilation, and air conditioning), using energy efficient appliances (e.g., LED lighting), or sourcing electricity from on-site renewables such as rooftop solar or purchasing green tariff electricity.

Scope 3 emissions sources (not under MSDC's direct control) are the largest source of reported emissions (97%), with the main contributors being purchased goods & services (86%) and diesel used in contractor fleets (10%).

- An effective net zero strategy should implement sustainable procurement mechanisms as an effective route to reduce emissions from purchased goods and services.
- Incentivising contractors to reduce diesel consumption can reduce emissions by promoting the use of ZEVs (Zero Emission Vehicles) or ULEV (Ultra Low Emission Vehicles) and alternative low carbon fuels.

2.1.4 Comparison with other Councils

It is helpful to compare these results with the GHG emissions from other Council's own operations, in particular second tier local authorities in the region.

Adur and Worthing Councils don't report their scope 3 emissions, but in their most recent report for 2019/20² their scope 1 and 2 emissions were split between vehicles (39%), gas use in buildings (32%) and electricity use (28%). It can therefore be seen that the emissions from their fleet is much greater than in Mid Sussex.

Arun Council's carbon footprint is similar to that of Mid Sussex, with 98.1% of total emissions being scope 3 in 2019-20 and 2020-21³ (the data therefore covers the period of the Covid-19 pandemic). The split of scope 1 and 2 emissions is also similar to Mid Sussex, with only 11% coming from petrol and diesel use, and much larger shares coming from gas and electricity use. And nearly all of the scope 3 emissions come from purchased goods and services, even more so than in Mid Sussex (86%).

Chichester Council reports on scopes 1, 2 and some scope 3 emissions. As can be seen in Appendix 2 of their Climate Emergency Action Plan⁴, 2019-20 scope 1 emissions were 47% of the total, scope 2 10% and scope 3 43%. However, it should be noted that only very few scope 3 sources were included - fuel- and energy-related activities not included in Scopes 1 & 2, business travel and downstream leased assets. They have excluded purchased goods and services, capital goods, upstream transportation and distribution, waste generated in operations and end-of-life treatment of sold products (would include emissions from trade waste collected by the Council). It might be expected that with all scope 3 sources included, the estimate for scope 3 might be similar to that of Mid Sussex in percentage terms.

Horsham District Council estimated their GHG emissions in 2018/19 to be 11% from scope 1, 8% from scope 2 and 81% from scope 3⁵.

² <https://www.adur-worthing.gov.uk/media/Media,158900,smxx.pdf>

³ <https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n18057.pdf&ver=18990>

⁴ <https://www.chichester.gov.uk/climatechange>

⁵ https://www.horsham.gov.uk/__data/assets/pdf_file/0006/77685/Carbon-Footprint-Report.pdf

2.2 INFLUENCE MAPPING

This section looks at what the key drivers are that affect the Council's own GHG emissions and which parties have most influence and control over them. This will then inform the development of the net zero plan.

2.2.1 Drivers of change

As a first step in influence mapping, it is helpful to consider what the drivers of changes in emissions are.

2.2.1.1 *Policies, plans and strategies*

Many of the national, regional and local-level drivers of change set out in the influence mapping for the district will also apply to the Council's own emissions. Please refer to Section 3.2 for more details on these. As an example:

- The national phase out on the sale of petrol and diesel vehicles by 2030/35 will lead to a decarbonising of the Council's vehicle fleet.
- National-level grid decarbonisation will continue to drive down the Council's emissions from its own electricity use.
- The Future Homes Standard will ensure that any new build Council buildings will not have gas connections from 2025.

But there are also certain other more specific drivers for Councils in terms of reporting on and managing their carbon footprint, which are outlined below.

2.2.1.2 *Emissions reporting*

Reporting of emissions will always be a key driver for climate action. By transparently reporting on their emissions, Councils provide the tools needed for interested parties to hold them to account over their emissions levels and to challenge their plans for emissions reductions. Previously, National Indicator 185, the percentage CO₂ reduction from local authority operations, required local authorities to calculate the carbon emissions of their buildings and services on a yearly basis and report the results to Government. However, these indicators were abolished in 2011 and there is now no requirement for local authorities to set or negotiate targets to reduce their own or area-wide emissions. This gap has led to patchy and inconsistent reporting of emissions, although some support is now being provided, for example the Local Government Association, with Local Partnerships and CDP, have recently launched a free GHG Accounting Tool for Scope 1 and 2 emissions and basic Scope 3 emissions. A small number of local authorities report emissions through the CDP.

GHG emissions reporting by local authorities still takes place but on a less mandatory basis, with a memorandum of understanding in place with various key milestones, including "to develop and agree an approach for sharing information on greenhouse gas emissions from councils' own estate and operations"⁶.

2.2.1.3 *Public expectation/pressure*

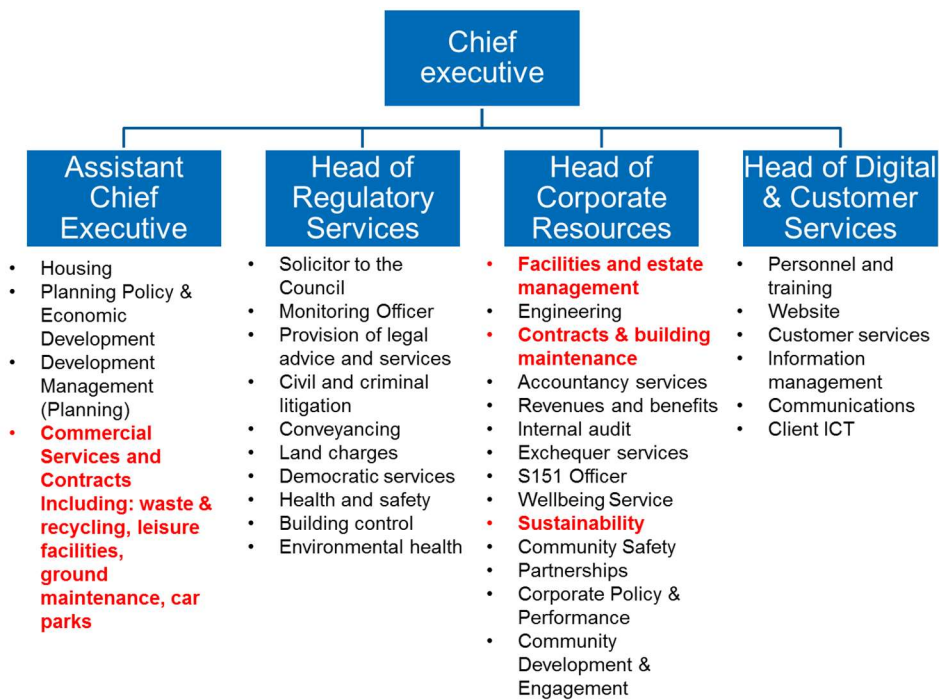
One of the key factors behind the recent drive of local authorities to declare climate emergencies has been public pressure and campaigning. It is hard to predict how this will change over time. On the one hand, we can expect that pressure to act on climate change will not go away and will likely only intensify, especially if local climate events (e.g., flooding) raise awareness of the issue. On the other hand, as local authorities develop more detailed plans for climate action, and publish the evidence base behind it, this could provide ammunition to those concerned about the transition to net zero, for example because of possible impact on lifestyles, cost of living, jobs etc.

⁶ <https://www.gov.uk/guidance/sharing-information-on-greenhouse-gas-emissions-from-local-authority-own-estate-and-operations-previously-ni-185>

2.2.2 Key stakeholders

We can see from the data in Section 2.1 that of the emissions that the Council can more easily control (scopes 1 and 2), nearly all (around 95%) comes from gas use in buildings and electricity use (most of which will be from buildings). Clearly then the Council teams responsible for the management and operation of the buildings will be key to achieving net zero for scope 1 and 2 emissions, specifically the Facilities and Estate management team and the Contracts and Building Maintenance team (see below for an organogram of the Council structure, although it should be noted that this will shortly change).

Figure 4: Mid Sussex District Council organogram



These teams should look for opportunities and funding to upgrade the Council’s building stock, improving energy efficiency and switching away from gas boilers towards decarbonised heating systems (e.g., heat pumps). They may also be able to maximise opportunities for rooftop solar PV to be installed on Council-owned buildings, in particular large roof spaces such as car parks.

2.2.2.1 Level of influence

Of the different emissions sources set out in Section 2.1, the Council and other key stakeholders (e.g. contractors) will have varying degrees of influence.

Emissions source	Degree of Council influence (high, medium, low)	Actions	Other key stakeholders
Scope 1 natural gas (buildings occupied by MSDC)	High	Should look to replace boilers with low carbon heating systems, e.g. heat pumps	
Scope 3 natural gas (tenant gas use – natural gas used by tenants in temporary housing, halls and	Low	Could make replacement of heating systems with low carbon a precondition of the lease? Could try to engage directly with tenants – however it is very difficult to work around tenants to	The organisations/individuals to which the buildings are being leased

community centres, and residential)		introduce alternative low carbon heating systems into properties e.g. tenant convenience, health and safety, etc.	
Scope 1 transport (fuels used in Council-owned vehicles)	High	Should look to replace vehicles with electric ones Introduce appropriate infrastructure e.g. electric charging points	
Scope 2 electricity	Medium	Switch suppliers to procure more renewable energy	Laser
Scope 3 electricity (tenant electricity yes)	Low	Could engage with tenants on the benefits of on-site renewables e.g. solar PV	Tenants
Scope 3 transport (business travel on public transport)	Medium	Could introduce policies to favour use of public transport. But convenience may often be a limiting factor e.g. cycle to work scheme, car share, reduced bus fare, etc.	Staff
Scope 3 transport (contractor vehicles)	Medium	Could ensure that requirement to move to a low carbon fleet is set out in contracts – will be a legal requirement for all cars from 2030 anyway	Contractors
Waste disposal (scope 3)	Low		Waste contractors
Purchased goods and services	Medium	Can use procurement policy to favour low carbon goods and services, but ultimately reliant on what the market can offer	Other councils (could joint procurement help increase influence?)

Not surprisingly, the Council tends to have more control over scope 1 emissions and less over scope 2 and then 3 emissions. But we can see that even within scope 3 emissions, the level of influence can vary. It is possible for a local authority to set a target that does not include all scope 3 emissions (although there is a risk that some stakeholders would view this as insufficient). But in Scotland, local authorities are given guidance to set a zero direct emissions target (for scope 1) and to aim to reduce scope 2 and 3 emissions but to mainly focus on those emissions sources over which it has most control. The Scottish Government points out that it “may be more appropriate to have a range of targets covering specific categories of indirect emissions, instead of one overarching target”.

2.3 NET ZERO PATHWAYS

2.3.1 The BAU scenario

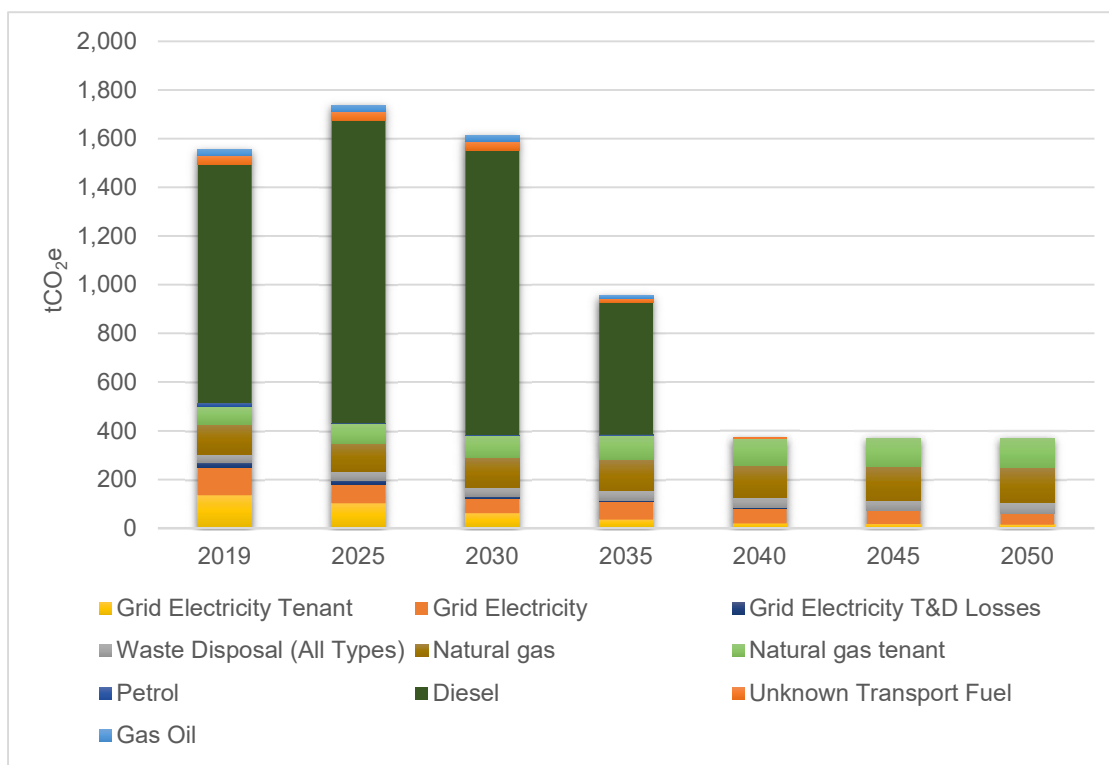
Projecting the baseline emissions to 2050 in line with the predicted business as usual (BAU) scenario provides an assessment of the gap compared to a net-zero scenario. This gap shows the scale of the intervention(s) required to achieve net-zero. It should be noted that this scenario only accounts for activities and events that are planned and are highly probable to occur.

As part of the BAU modelling, we looked to capture any information that will affect MSDC’s carbon emissions under business-as-usual conditions. This includes known plans for building stock, projects confirmed and in the pipeline that will affect the emissions sources included within the baseline as well as growth in emissions sources due to external factors and efficiency trends. These are summarised below:

- **Known internal factors:** Known internal factors/changes that will impact on the baseline emissions, e.g., increasing temporary housing by 100% by 2040.
- **Known external factors:** Known external factors/changes that will impact on the baseline emissions, e.g., ongoing decarbonisation of the national grid, UK Government ban on sales of fossil fuel cars after 2030.
- **Confirmed pipeline projects:** Projects that impact emissions that have been signed off on or are very close to being given the go-ahead, e.g., plans to install a building management system (BMS) at Oaklands Bolstro Road to provide more control of heating.
- **Growth rate:** This growth rate will be used by the model to indicate how emissions will grow year-on-year due to multiple affects. E.g., MSDC have suggested a conservative estimate of 1% annual growth within the council's operations.
- **Efficiency rate:** This rate counteracts the growth rate and is due to ongoing improvements in efficiency (energy/utility use) in the way the council is run. E.g. vehicle fleet will become more fuel efficient with time as vehicles are replaced with modern variants.

2.3.2.1 BAU modelling results

The outputs of the BAU modelling are shown below in [Figure 5](#), [Figure 6](#), [Figure 7](#), [Figure 8](#), [Figure 10 – BAU emissions by source \(excluding purchased goods and services\), 2019-2050](#)



and

Figure 10.

The main factors already committed by MSDC that will contribute to the projected emissions under BAU are:

1. The removal of all old light fittings and replacement with LED lightings at Orchards. It has been assumed that lighting accounts for approximately 20% of the overall electricity consumption at Orchards. We have modelled a 75% reduction in energy consumption from LED lighting within that proportion of electricity consumption.
2. MSDC have introduced a building management system (BMS) at Oaklands Bolstro Road to provide more control of heating. Estimated 10% savings in natural gas consumption.

3. MSDC have replaced an inefficient single pipe system with a twin pipe system, which combined with a BMS, has the potential to accumulate an additional 1% saving in heating demand.
4. MSDC are currently in the process of transitioning away from conventional fossil fuel vehicles to electric vehicles (EVs). The council has currently replaced three out of five petrol vehicles with EVs and plans to replace one more in 2022.
5. Increased delivery in contracted services as a result of food collection in 2024. We have assumed a 26% proportional increase above the current quantity of fuel used for contracted services.
6. All grey fleet, public transport and taxis will be replaced with EVs by end of 2040 due to UK Government policy of halting sales of new fossil fuel vehicles from 2030. Modelled as gradual change over next 25 years.
7. Decarbonisation of the national grid. BEIS projected emission factors for UK electricity generation have been used to model a gradual decrease in emissions intensity.

Modelling shows that under a BAU scenario, total emissions (scopes 1, 2 and 3) will increase by around 14% by 2050 without any further intervention from MSDC. The remaining emissions gap that will need to be addressed to achieve net-zero in 2050 is 11,177 tCO₂e. The increase is driven by an expected increase in scope 3 emissions. When looking at scopes 1 and 2 only, emissions are expected to fall by 25% by 2050.

Figure 5 – BAU emissions by scope 1, 2 and 3, 2019-2050

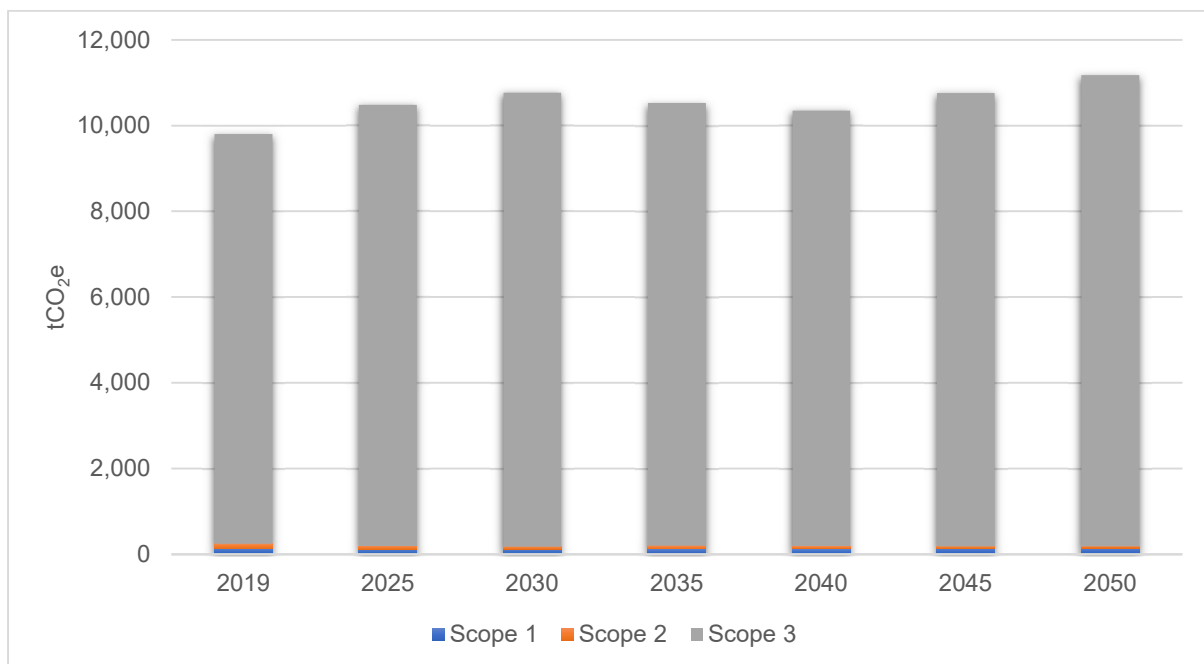


Figure 6 – BAU emissions by scope 1 and 2, 2019-2050

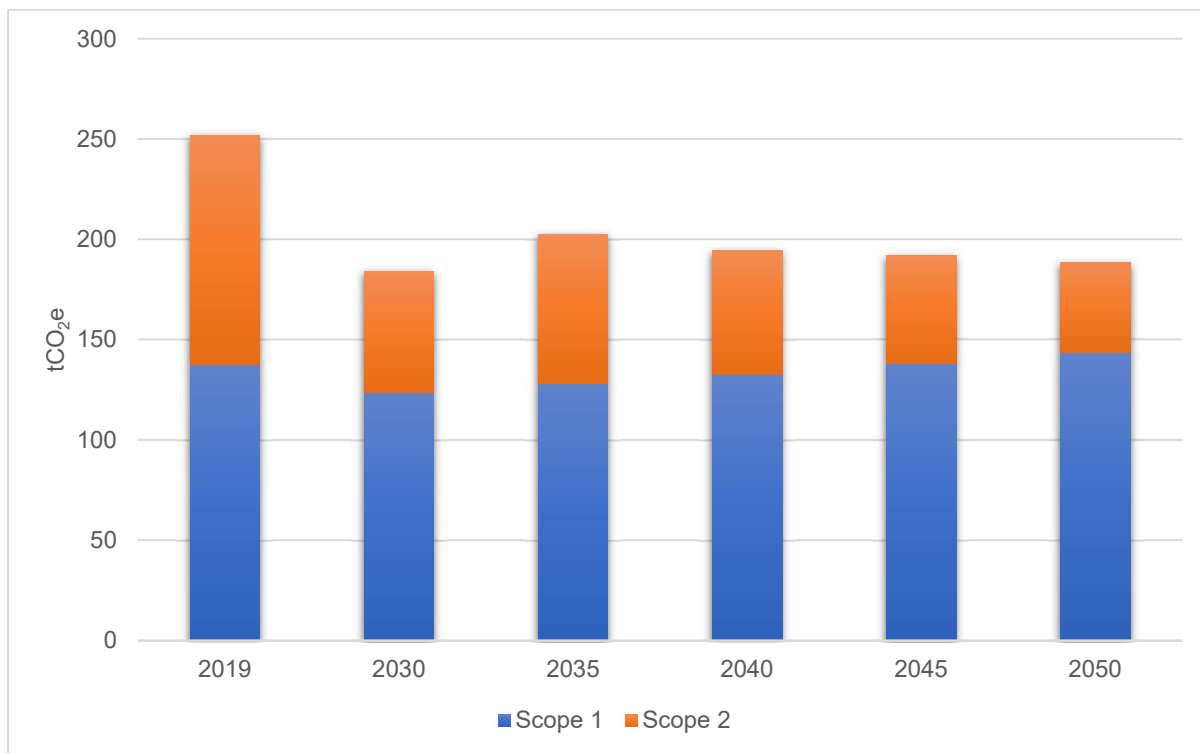


Figure 7 – BAU emissions by area, 2019-2050

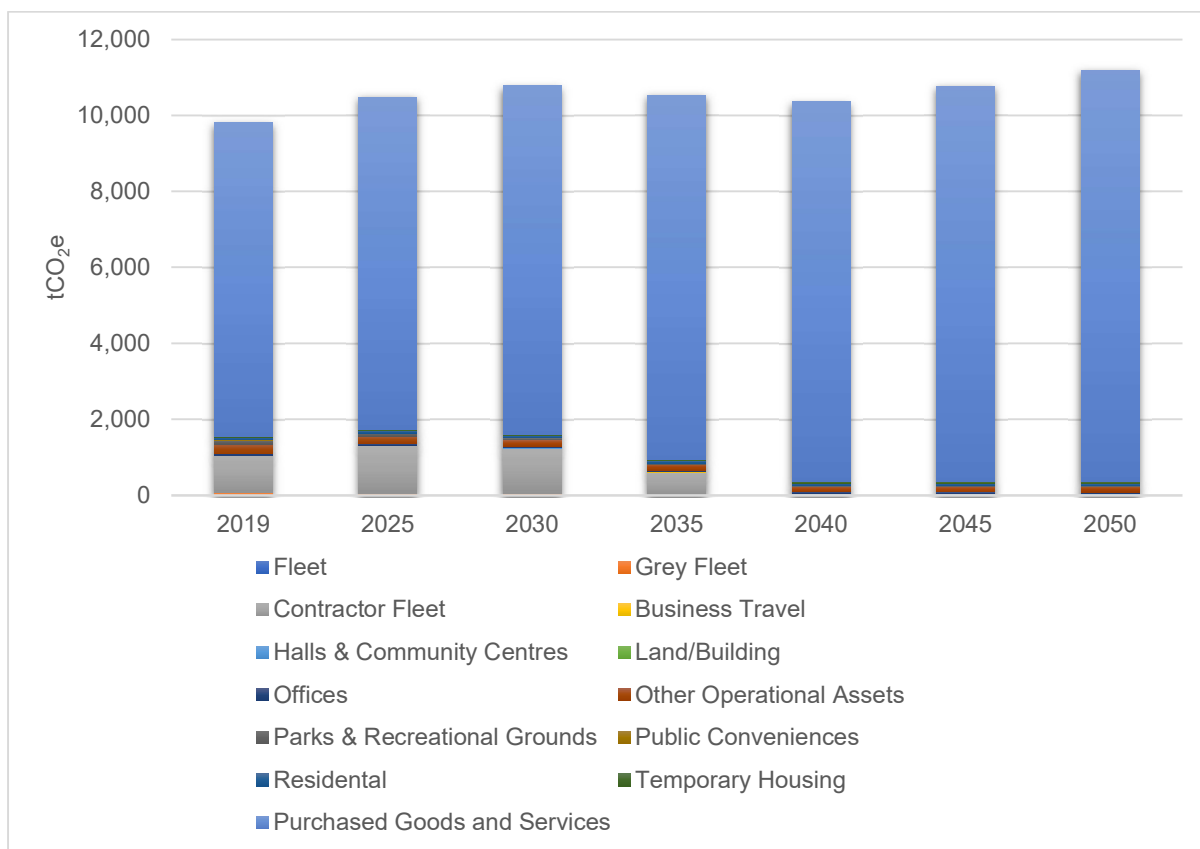


Figure 8 – BAU emissions by area (excluding purchased goods and services), 2019-2050

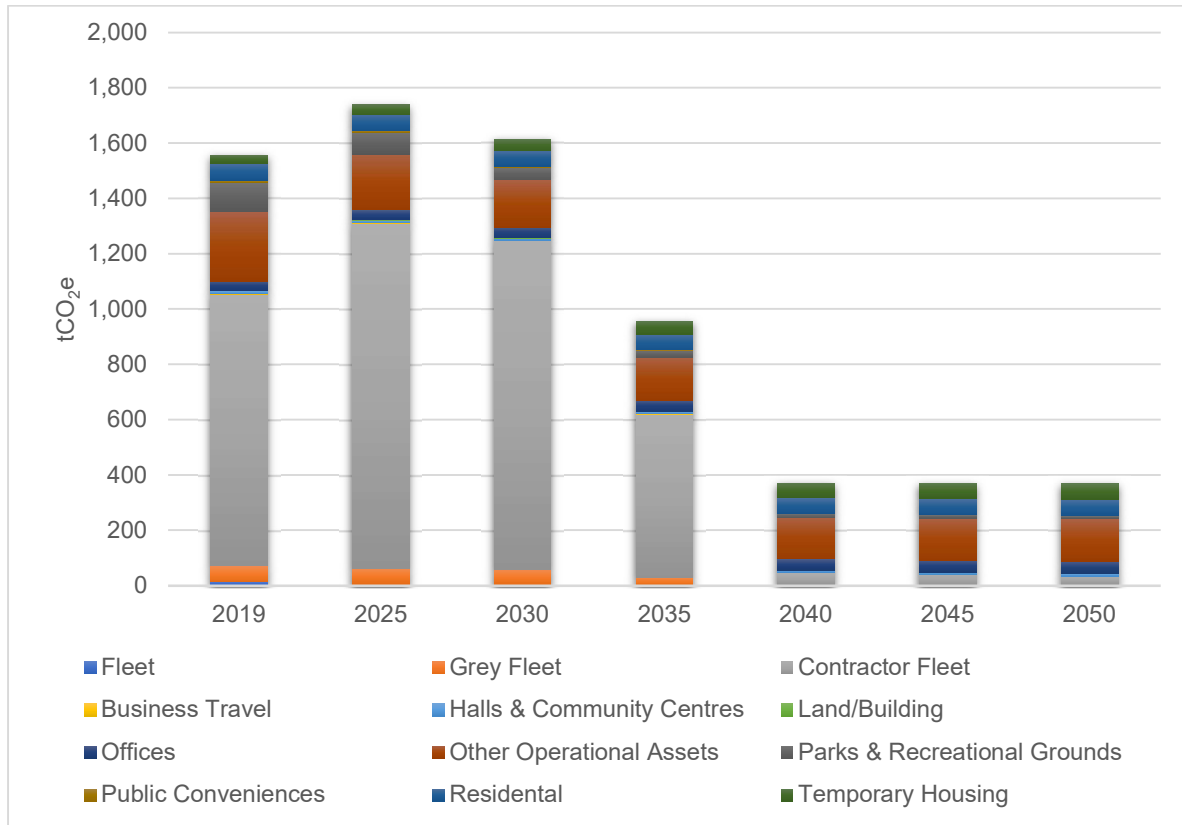


Figure 9 – BAU emissions by source, 2019-2050

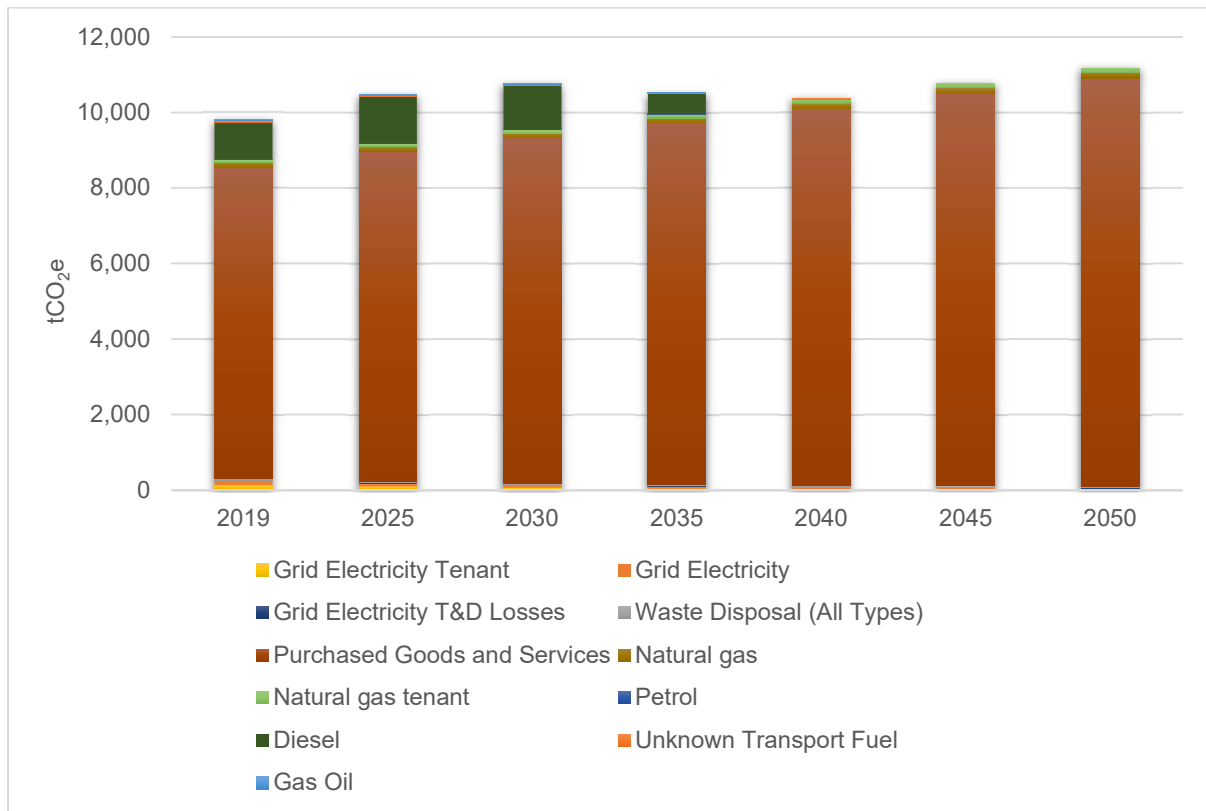


Figure 10 – BAU emissions by source (excluding purchased goods and services), 2019-2050

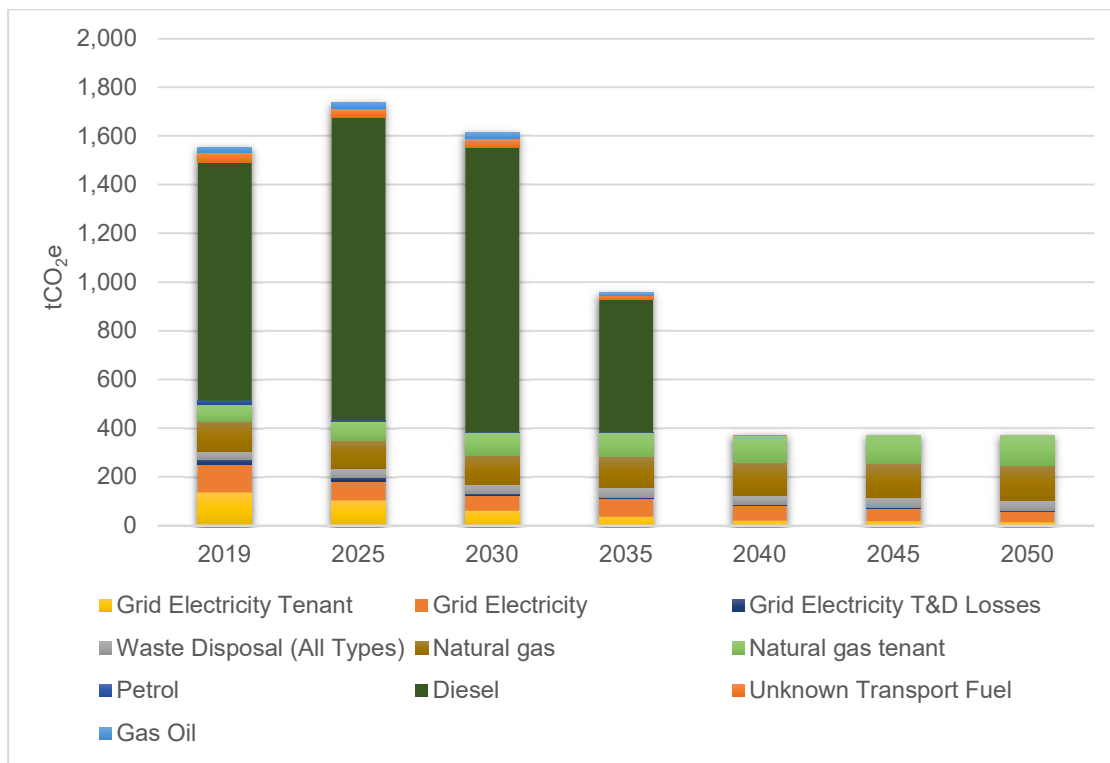


Figure 7 demonstrates that the purchase of goods and services are projected to be the largest proportion of emissions remaining in 2050, accounting for 96.7% of the overall total. The second largest is natural gas at 1.2%. The expected decarbonisation of the UK national grid means that electricity emissions are expected to fall year-on-year at a faster rate than the growth rate and efficiency rate account for. All other emission factors remain static across the modelled period, and, as such, any changes reflect growth and efficiency rates as well as any modelled BAU changes.

By 2050, the remaining emissions for MSDC are from a range of emissions sources, including grid electricity, electricity transmission and distribution losses, waste, water, natural gas, and emissions from purchased goods and services.

After accounting for planned business-as-usual activities and changes, the largest challenges for MSDC to address by 2050 if it is to achieve net-zero are:

1. Reducing emissions associated with the purchase of goods and services as much as feasibly possible.
2. Divesting from all fossil fuel use across all sites e.g., identifying alternative options for heating sites that currently use conventional gas boilers.
3. Establishing off-grid sources of renewable electricity and/or purchasing green electricity.

2.3.2 2050 net zero scenario

2.3.2.1 Overview of implementation pathway

When analysing the timeline and aspiration for implementation of decarbonisation measures, the following 2050 net zero pathway assumes that sufficient resources and budget are made available to allow the rapid implementation of decarbonisation measures while taking account of current contractual

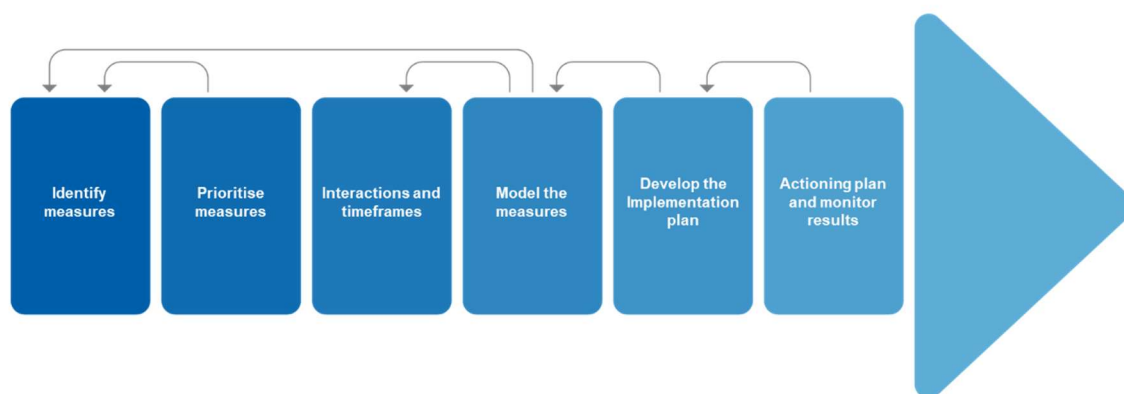
constraints. Importantly, this approach collectively applied by the public sector can support the required market transformation of buildings and energy use across the UK. This approach would also minimise cumulative carbon emissions which, in turn, will reduce the impact of climate change and the associated health implications on the global population.

However, there may be negative cost implications as it is possible that a premium will be paid because of early adoption of these solutions before market forces drive down costs. There is also a risk that MSDC could invest in solutions which are made redundant by later technological developments. On the other hand, this proactive approach could avoid a situation where MSDC finds itself approaching the 2050 target and having to pay a premium for low-carbon solutions because demand exceeds availability. This situation could be exacerbated by a late rush to adapt to net zero by the private sector, which ultimately could lead to MSDC missing the 2050 target.

2.3.2.2 Introduction to decarbonisation measures

Identifying decarbonisation interventions and developing emissions reduction plans is an iterative process that has generated a live document for MSDC that will evolve over time. The feedback loops are shown in [Figure 11](#) below, and the following sections of this report reflect some of the identification, prioritisation, interactions and modelling loops that took place during the project.

Figure 11 - Workflow to develop decarbonisation interventions



A long list of decarbonisation measures to reduce MSDC's emissions were identified by the Ricardo technical leads across the following categories:

- Heating systems.
- Waste management.
- Energy efficiency.
- Renewable energy generation.

The measures were entered into Ricardo's modelling tool, taking account of factors such as:

- Fuel type and kWh (before and after each measure is implemented).
- Which year the measure is undertaken, and the number of years needed to implement.
- Fuel and cost savings associated with the net zero audit undertaken by Ricardo⁷.

Note: Costs indicated are based on a high-level desk-based assessment of potential measures, with all information on current systems and practices provided by MSDC. As such, full financial and technical feasibility studies will need to be carried out before measures are implemented.

⁷ Note: Projected cost savings do not take into account any future government policies (such as a levy on natural gas) that may impact fuel costs to drive people towards low carbon fuels, or other incentive schemes such as RHI payments that will impact the financial feasibility of a move to low carbon heating systems.

Factors around site suitability, technical feasibility and financial feasibility were considered to inform the modelling. It is noted that all measures will need to be installed in compliance with standard MSDC operating procedures and health standards.

A description of each short-listed measure has been provided in **Appendix C** of this report, a summary which is provided in [Table 4](#).

Table 4: Modelled MSDC decarbonisation measures

Mitigation Measure
Installing air source heat pumps (ASHP)
Improving energy management and controls
Energy sub metering / reporting systems
Installing LED Lighting
Optimising the operation of existing plant
Installing new roof-mounted solar photovoltaics
External / internal wall insulation, and loft / roof insulation
Improved waste segregation and recycling rate
Reduction in waste arisings due to prevention management

This 2050 net zero pathway model assumes that MSDC is supported in funding to prioritise the reduction of carbon emissions ahead of cost implications. It assumes that budget could be secured to allow rapid investment in measures that reduce carbon emissions.

2.3.2.3 *Net zero audit*

As part of this study, a net zero audit was undertaken by Ricardo to inform the measures that were entered into the modelling tool and discussed in this section. The sites that were selected for the audit were chosen as a representative sample of MSDC's broader site portfolio. These include:

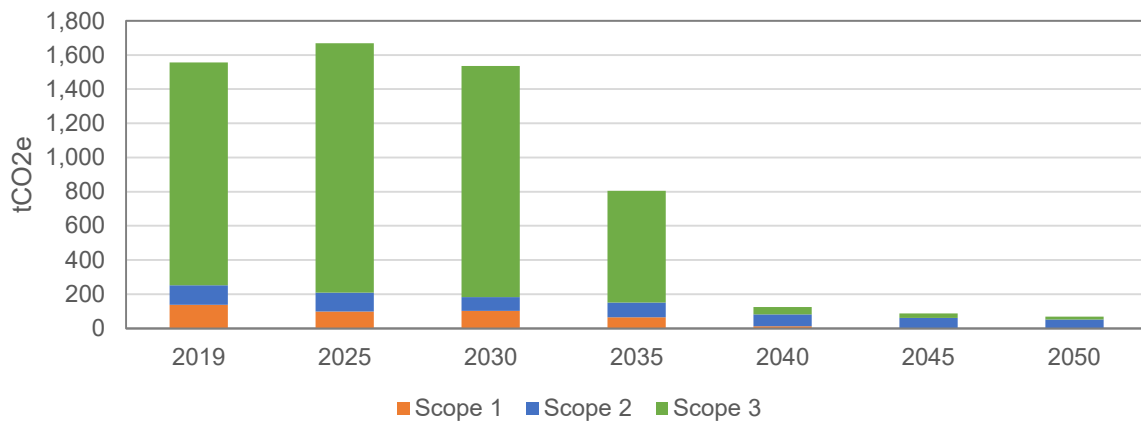
- Oaklands Main Office
- St Johns Pavilion
- Sheddingdean Community Centre

The scope of this audit was to investigate potential decarbonisation measures that could be applied to each site and scaled in order to support a reduction in emissions. The audit has been carried out in line with the requirements of BS EN 16247-2:2014 Buildings and included a site visit with inspection of the premises and discussions with staff, plus off-site analysis examining energy data. The energy and cost savings identified during this audit can be found in **Appendix B**.

2.3.2.4 *Pathway mitigation potential*

The following charts illustrate the mitigation potential for a net zero pathway to 2050. Please note that this net zero pathway excludes the purchase of goods and services due to its significant proportion of emissions within the baseline, accounting for 86% of the overall emissions.

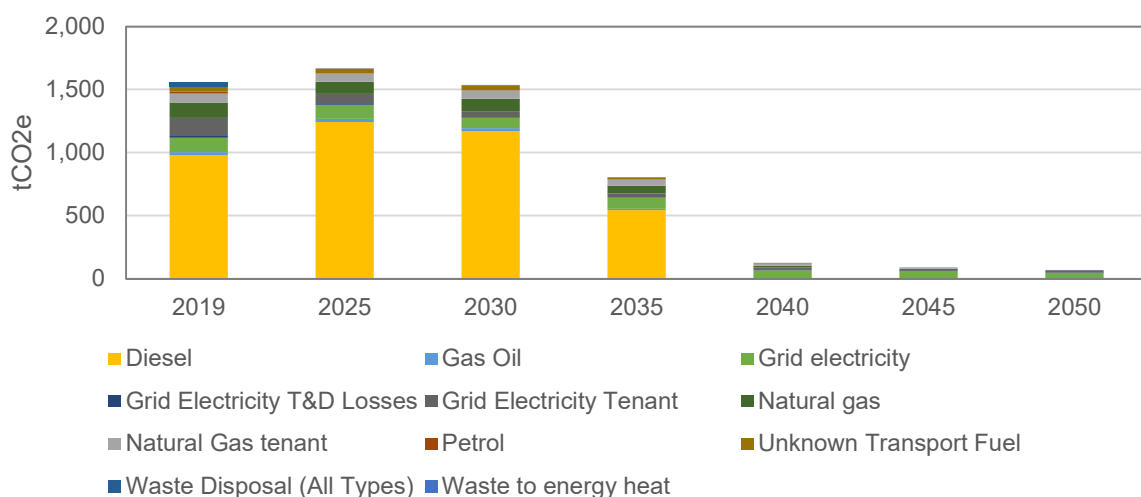
Figure 12 - Impact of net zero pathway split by emissions scope



Scope	2019	2025	2030	2035	2040	2045	2050
Scope 1 (tCO ₂ e)	138	98	103	65	13	2	2
Scope 2 (tCO ₂ e)	114	112	80	85	68	59	49
Scope 3 (tCO ₂ e)	1,304	1,459	1,352	655	44	27	17
Total (tCO₂e)	1,556	1,669	1,535	806	125	89	69
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

Figure 12 shows the impact of the net zero pathway on total baseline emissions, as well as each individual emissions scope. The overall reduction in emissions seen between 2019 and 2050 is 96%. The residual emissions in 2050 are 25% attributed to scope 3, 71% to Scope 2, with the remaining 4% in Scope 1.

Figure 13 - Impact of net zero pathway split by emissions source

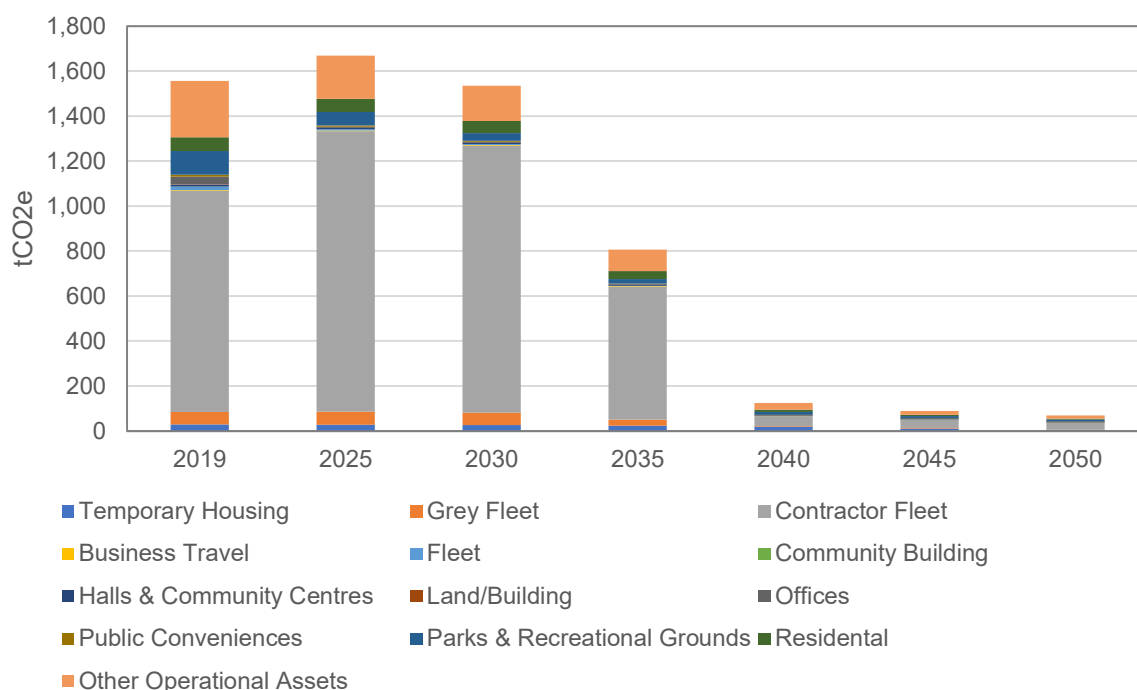


Emissions source	2019	2025	2030	2035	2040	2045	2050
Diesel	978.9	1,242.2	1,170.7	543.8	0.0	0.0	0.0
Gas Oil	24.8	25.9	24.4	11.3	0.0	0.0	0.0

Grid Electricity	114.1	111.7	79.6	85.5	68.1	58.9	49.0
Grid Electricity T&D Losses	21.2	11.1	6.7	3.8	2.2	1.9	1.5
Grid Electricity Tenant	135.9	75.7	47.4	31.3	20.7	18.6	15.6
Natural Gas	123.1	94.6	99.0	62.1	10.8	0.0	0.0
Natural Gas tenant	70.7	64.5	66.5	47.7	20.1	6.8	0.0
Petrol	15.5	2.8	2.6	1.2	0.0	0.0	0.0
Unknown Transport Fuel	37.9	38.6	35.8	17.1	0.8	0.0	0.0
Waste Disposal (All Types)	33.4	0.0	0.0	0.0	0.0	0.0	0.0
Waste to energy heat	0.0	2.0	2.1	2.2	2.3	2.3	2.4
Total (tCO₂e)	1,555.6	1,668.9	1,534.8	806.0	125.0	88.6	68.6
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

Figure 14 shows how the net zero pathway impacts each of the emissions sources that contribute to the total footprint. Notably, the impact of switching from fossil fuels such as natural gas used in conventional boilers can have a significant impact on the reduction on emissions. For example, when switching natural gas used for space heating with heat pumps, this will initially result in an uplift in emissions associated with electricity. However, this is more than compensated by the reduction in emissions associated with gas use. In addition, as the UK grid decarbonises its electricity generation, the emissions per kWh of electricity usage decreases. For instance, in 2019/20 the emissions per kWh of electricity was 0.2556 kg of CO₂e. This decreased by 17% to 0.21233 kg of CO₂e in 2020/21. As a result, emissions from electricity will level off and start to fall overall.

Figure 14 – Impact of net zero pathway split by emissions area

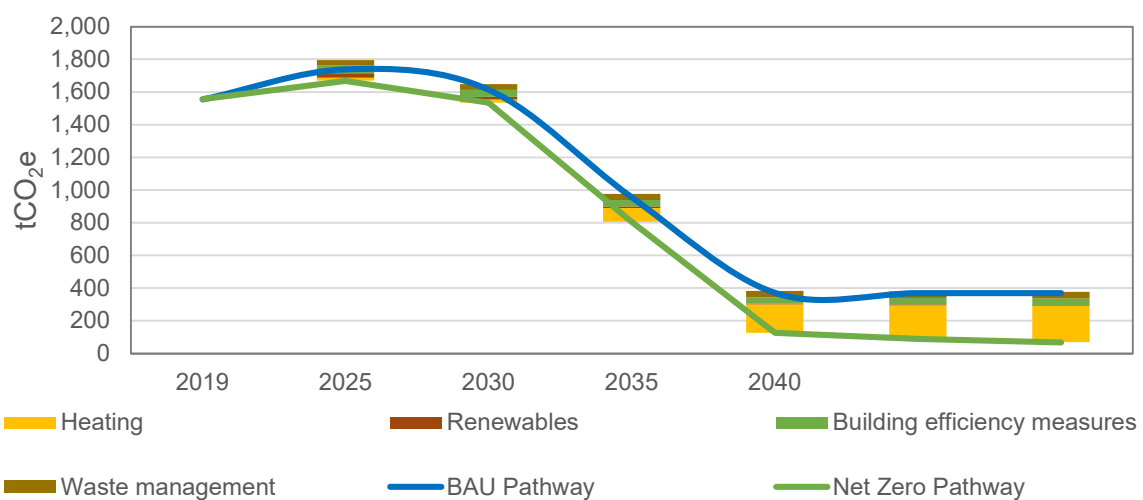


Emissions area	2019	2025	2030	2035	2040	2045	2050
Temporary Housing	28.9	28.0	26.0	23.4	19.5	11.5	4.2
Grey Fleet	56.3	58.6	55.9	27.8	2.1	1.9	1.6
Contractor Fleet	982.2	1,245.7	1,186.8	590.6	44.2	38.6	32.3
Business Travel	3.9	3.4	2.7	1.9	0.9	0.2	0.1
Fleet	14.6	4.9	3.7	2.0	0.7	0.6	0.5

Community Building	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Halls & Community Centres	9.0	8.6	7.7	5.0	1.6	0.8	0.7
Land/Building	1.4	0.9	0.6	0.3	0.2	0.2	0.1
Offices	34.5	2.8	2.8	2.6	2.4	2.4	2.5
Public Conveniences	8.1	5.3	3.1	1.8	1.0	0.9	0.7
Parks & Recreational Grounds	105.4	59.7	35.3	20.2	11.5	9.7	7.9
Residential	60.3	57.8	53.2	35.3	11.0	5.7	4.7
Purchased Goods and Services	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other Operational Assets	250.7	193.1	157.0	95.2	29.8	16.1	13.1
Total (tCO₂e)	1,555.6	1,668.9	1,534.8	806.0	125.0	88.6	68.6
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

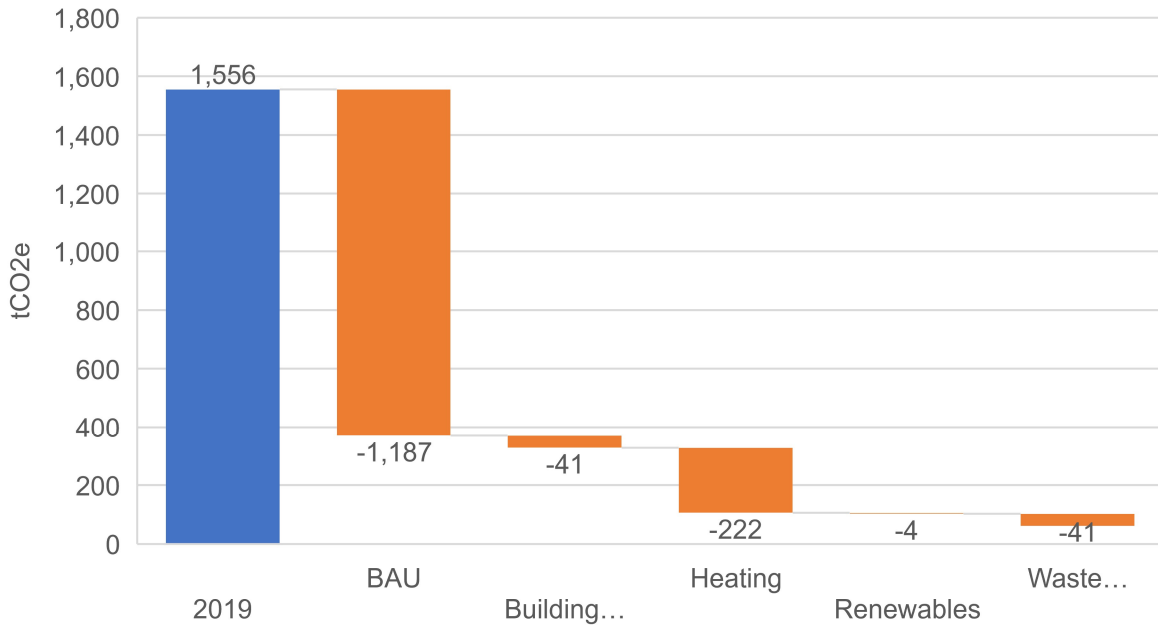
Figure 14 shows that under a 2050 net zero scenario, mitigation measures implemented across temporary housing, residential areas, parks and recreational grounds, and other operational assets (e.g., Oaklands Main Office) can be seen to have the largest cumulative reduction in emissions. The breakdown of these emissions is shown in the table above.

Figure 15 - Comparing the net zero pathway to business as usual



Under the 2050 net zero pathway, baseline emissions are reduced by 96% compared to 76% under a business-as-usual scenario. Figure 15 shows the contribution of groups of measures compared to the significantly reduced emissions profile of the net zero pathway. Emissions can be seen to initially increase as a result of the council's plans to 1) double temporary housing by 2040, and 2) increase delivery in contracted services as a result of food collection planned in 2024. The reduced emissions profile is also shown as a waterfall diagram in Figure 16 below. This highlights the substantial opportunity available through low or zero emissions properties to significantly address MSDC's primary source of emissions.

Figure 16 - Carbon savings by measure for the 2050 net zero pathway, cumulative from 2019/20 baseline to 2049/50



2.3.2.5 Residual emissions

Regardless of the implementation plan MSDC chooses to adopt, there will be residual emissions remaining in 2050. A breakdown of scope and categories of residual emissions is provided below in Figure 17 and the supporting table.

Figure 17: Residual emissions in 2050, split by scope

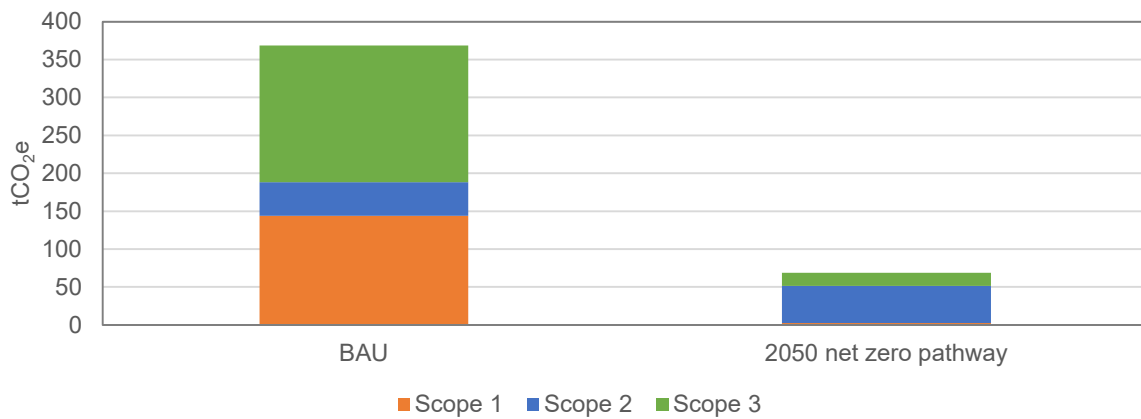
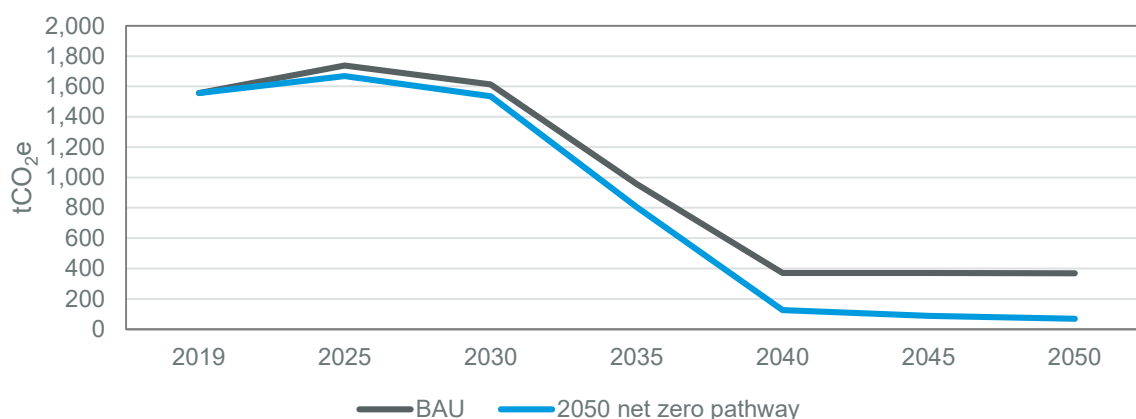


Figure 18: Residual emissions in 2050, split by pathway



tCO ₂ e	2019	2025	2030	2035	2040	2045	2050
BAU	1,556	1,739	1,614	956	371	370	369
2050 net zero pathway	1,556	1,669	1,535	806	125	89	69

Emissions area	BAU (tCO ₂ e)	2050 pathway (tCO ₂ e)
Diesel	0.0	0.0
Gas Oil	0.0	0.0
Grid electricity	44.6	49.0
Grid Electricity T&D Losses	2.1	1.5
Grid Electricity Tenant	14.2	15.6
Natural gas	143.8	0.0
Natural Gas tenant	120.1	0.0
Petrol	0.0	0.0
Unknown Transport Fuel	0.0	0.0
Waste Disposal (All Types)	43.8	0.0
Waste to energy heat	0.0	2.4
Total	368.7	68.6
% of 2019/20 baseline	23.7%	4.4%

2.3.2.6 Offsetting

While outside of the project scope, it is useful to understand the scale and potential cost of offsetting residual emissions to achieve net-zero emissions in 2050. We have estimated the cost of offsetting residual emissions in mid-century at £160/tCO₂ based on a recent assessment by the Grantham Institute⁸. This sets the carbon price at a level equivalent to the projected marginal abatement cost, the price signal considered necessary to deliver net-zero in UK industry.

Based on the modelled pathways, the cost of off-setting residual emissions for the year 2050 would be:

- BAU: £58,985
- 2050 net zero pathway: £10,969

⁸ http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2019/05/GRI_POLICY-REPORT_How-to-price-carbon-to-reach-net-zero-emissions-in-the-UK.pdf

It is important to note that there are more options than offsetting to tackle residual emissions such as inssetting emissions reduction projects within the supply chain and downstream activities. **Of particular relevance to MSDC is the option to offset grid electricity emissions by purchasing renewables tariff electricity, which accounts for approximately 17% of all residual emissions in the BAU, and 96% in the 2050 net zero pathway.** This enables climate-related expenditure to remain within value creation cycle and reduces heavy spend on transactional costs for offsets.

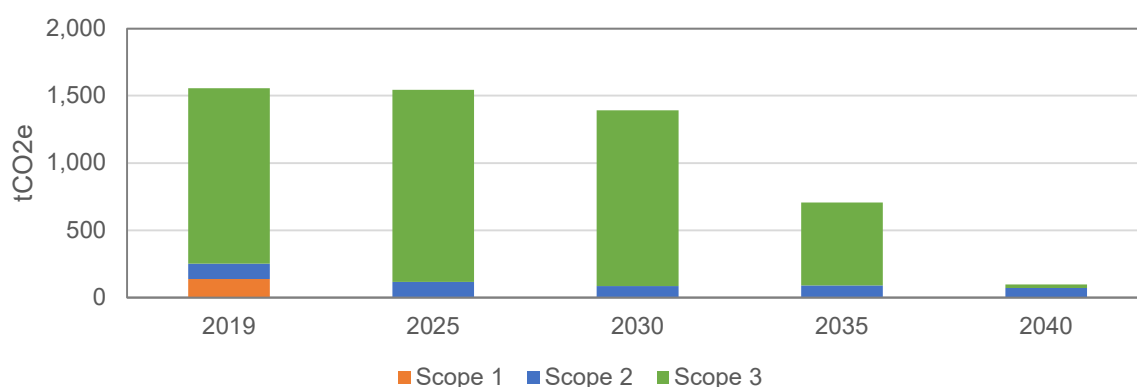
2.3.3 Accelerated net zero scenario (2040)

When analysing the timeline and aspiration for implementation of decarbonisation measures, the notable difference between a 2040 and 2050 pathway is the budget made available to allow the rapid implementation of decarbonisation measures and rate at which measures can be implemented. This scenario assumes that significant resources and budget will be made available to MSDC, meaning that the implementation plan can be brought forward to 2040 for achieving net zero emissions.

2.3.3.1 Pathway mitigation potential

The following charts illustrate the mitigation potential for a net zero pathway to 2040. As with the 2050 net zero pathway, this projection excludes the purchase of goods and services due to its significant proportion of emissions within the council’s estate.

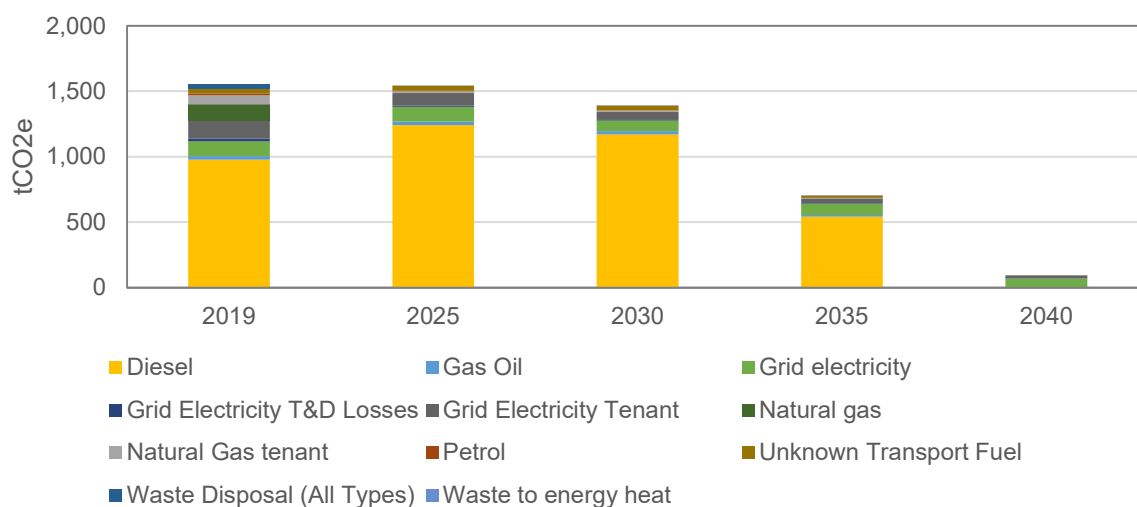
Figure 19 - Impact of net zero pathway split by emissions scope



	2019	2025	2030	2035	2040
Scope 1 (tCO ₂ e)	138	4	4	3	2
Scope 2 (tCO ₂ e)	114	112	80	86	68
Scope 3 (tCO ₂ e)	1,304	1,428	1,308	618	25
Total (tCO₂e)	1,556	1,544	1,392	706	96
% change	0%	-1%	-11%	-55%	-94%

Figure 19 shows the impact of the net zero pathway on total baseline emissions, as well as each individual emissions scope. The overall reduction in emissions seen between 2019 and 2040 is 94%. The residual emissions in 2040 are 26% attributed to scope 3, 71% to Scope 2, with the remaining 2% to Scope 1.

Figure 20 - Impact of net zero pathway split by emissions source

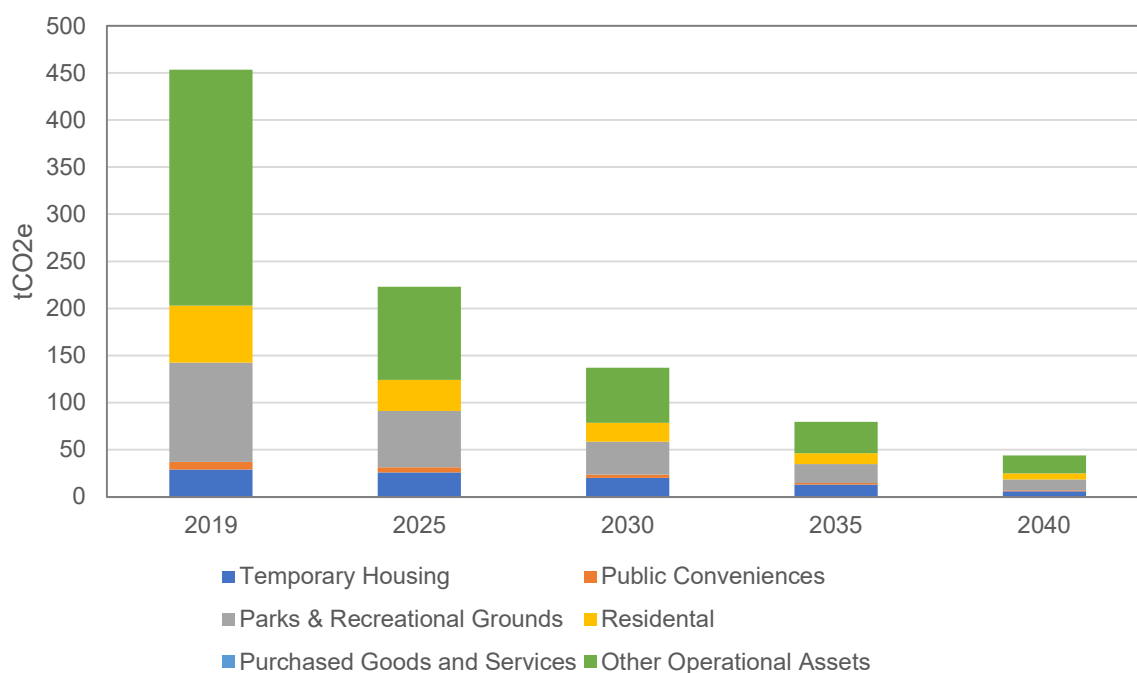


Emissions source	2019	2025	2030	2035	2040
Diesel	978.9	1,242.2	1,170.7	543.8	0.0
Gas Oil	24.8	25.9	24.4	11.3	0.0
Grid Electricity	114.1	111.9	79.7	85.5	68.1
Grid Electricity T&D Losses	21.2	11.1	6.7	3.8	2.2
Grid Electricity Tenant	135.9	95.8	60.5	37.0	22.2
Natural Gas	123.1	0.0	0.0	0.0	0.0
Natural Gas tenant	70.7	13.8	9.3	4.3	0.0
Petrol	15.5	2.8	2.6	1.2	0.0
Unknown Transport Fuel	37.9	38.6	35.8	17.1	0.8
Waste Disposal (All Types)	33.4	0.0	0.0	0.0	0.0
Waste to energy heat	0.0	2.0	2.1	2.2	2.3
Total (tCO₂e)	1,555.6	1,544.0	1,391.8	706.3	95.6
% change	0%	-1%	-11%	-55%	-94%

Figure 20 shows how the net zero pathway impacts each of the emissions sources that contribute to the total footprint.

As with the 2050 net zero scenario, the impact of switching from natural gas used for space heating to heat pumps is crucial for reducing emissions. However, this pathway assumes that new technologies such as heat pumps will be installed across the site portfolio at a much quicker rate. For example, the model assumes that natural gas will be completely phased out from temporary housing by 2040 (compared to 2050 in the 2050 net zero scenario). Funding is therefore essential for this technology to be rolled out. Moreover, residents will therefore need some form of engagement to understand the socio-economic implications of installing a heat pump for this to be viable.

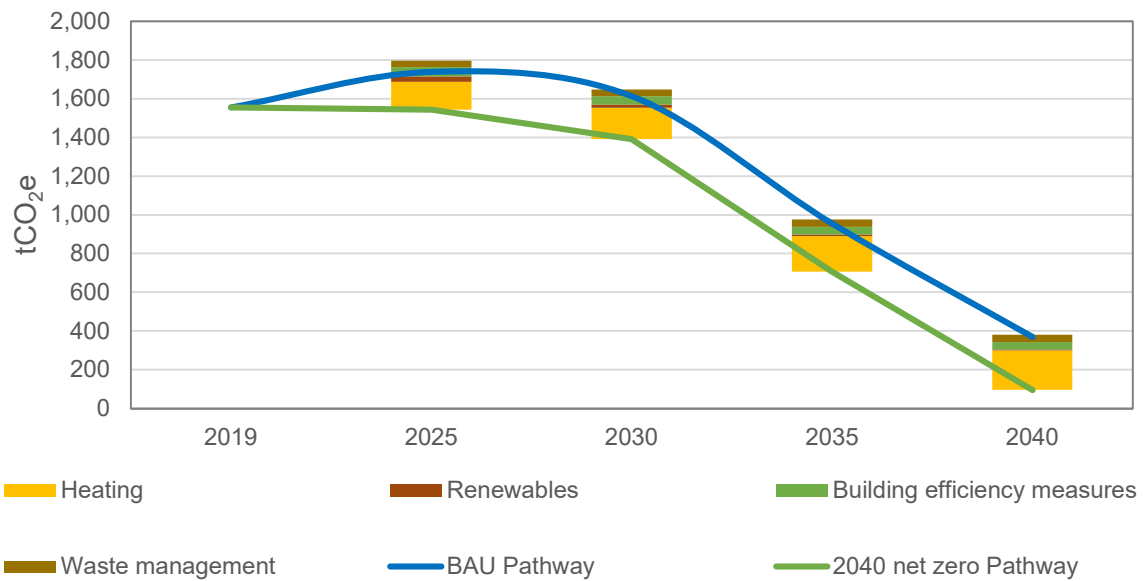
Figure 21 – Impact of net zero pathway split by emissions area



Emissions area	2019	2025	2030	2035	2040
Temporary Housing	28.9	26.1	20.3	12.8	5.9
Grey Fleet	56.3	58.6	55.9	27.8	2.1
Contractor Fleet	982.2	1,245.7	1,186.8	590.6	44.2
Business Travel	3.9	3.4	2.7	1.9	0.9
Fleet	14.6	4.9	3.7	2.0	0.7
Community Building	0.0	0.0	0.0	0.0	0.0
Halls & Community Centres	9.0	4.8	2.9	1.7	1.0
Land/Building	1.4	0.9	0.6	0.3	0.2
Offices	34.5	2.5	2.4	2.4	2.4
Public Conveniences	8.1	5.3	3.1	1.8	1.0
Parks & Recreational Grounds	105.4	59.7	35.3	20.2	11.5
Residential	60.3	33.0	19.7	11.4	6.6
Purchased Goods and Services	0.0	0.0	0.0	0.0	0.0
Other Operational Assets	250.7	99.0	58.5	33.4	19.0
Total (tCO₂e)	1,555.6	1,544.0	1,391.8	706.3	1,555.6
% change	0%	-1%	-11%	-55%	-94%

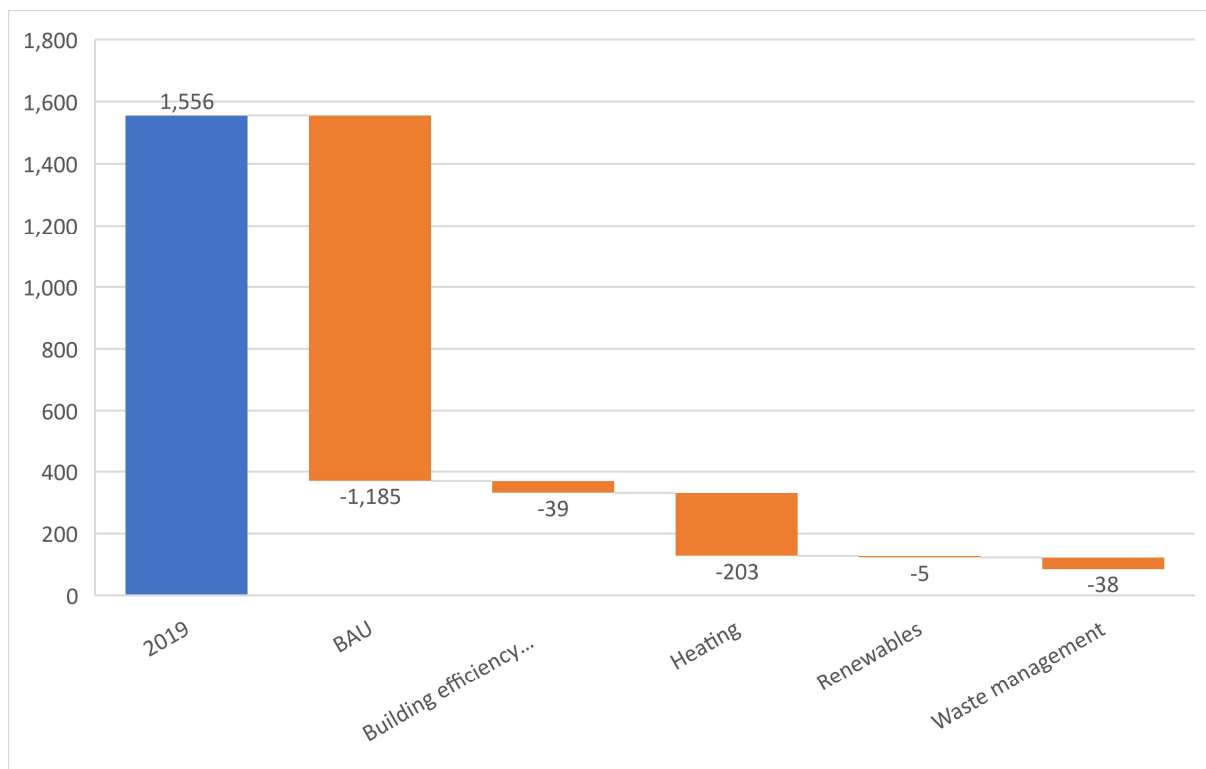
Figure 21 shows that under a 2040 net zero scenario, mitigation measures associated with other operational assets (e.g. Oaklands Main Office), and parks and recreational grounds can be seen to have the largest cumulative reduction in emissions.

Figure 22 - Comparing the net zero pathway to business as usual



Under the accelerated net zero pathway, baseline emissions are reduced by 94% compared to 76% under a business-as-usual scenario. Figure 22 shows the groups of measures which present a significantly reduced emissions profile within the 2040 net zero pathway. This is also shown as a waterfall diagram in Figure 23 below. This highlights the substantial opportunity available through low or zero emissions properties to significantly address MSDC’s primary source of emissions.

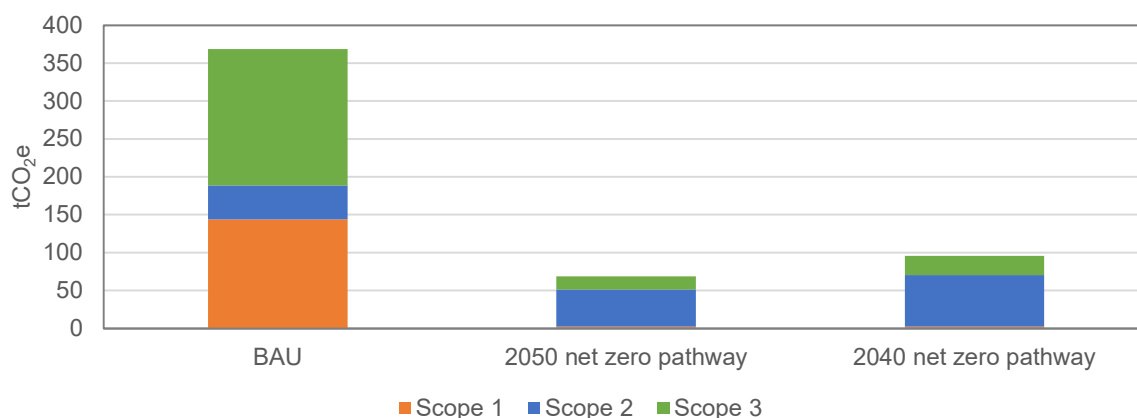
Figure 23 - Carbon savings by measure for the net zero pathway, cumulative from 2019/20 baseline to 2039/40



2.3.3.2 Residual emissions

Similar to the 2050 net zero pathway, regardless of the implementation plan MSDC chooses to adopt, there will be residual emissions remaining in 2040. A comparison breakdown of scope and categories of emissions is provided below in Figure 24 and the following table.

Figure 24: Residual emissions in 2040 and 2050, split by scope



tCO ₂ e	2019	2025	2030	2035	2040
BAU	1,556	1,739	1,614	956	371
2040 net zero pathway	1,556	1,544	1,392	706	96

Emissions area	BAU (tCO ₂ e)	2040 pathway (tCO ₂ e)
Diesel	0.0	0.0
Gas Oil	0.0	0.0
Grid electricity	44.6	68.1
Grid Electricity T&D Losses	2.1	2.2
Grid Electricity Tenant	14.2	22.2
Natural gas	143.8	0.0
Natural Gas tenant	120.1	0.0
Petrol	0.0	0.0
Unknown Transport Fuel	0.0	0.8
Waste Disposal (All Types)	43.8	0.0
Waste to energy heat	0.0	2.3
Total	368.7	95.6
% of 2019/20 baseline	23.7%	6.1%

2.3.3.3 Offsetting

As outlined in the previous section, we have estimated the cost of offsetting residual emissions in mid-century at £160/tCO₂ based on a recent assessment by the Grantham Institute⁹.

Based on the modelled pathways, the cost of off-setting residual emissions for the year 2050 would be:

- BAU: £58,985
- 2040 net zero pathway: £15,296

Of particular relevance to MSDC is the option to offset grid electricity emissions by purchasing renewables tariff electricity, which accounts for approximately 17% of all residual emissions in the BAU, and 97% in the 2040 net zero pathway. This enables climate-related expenditure to remain within value creation cycle and reduces heavy spend on transactional costs for offsets.

⁹ http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2019/05/GRI_POLICY-REPORT_How-to-price-carbon-to-reach-net-zero-emissions-in-the-UK.pdf

3 A NET ZERO DISTRICT

Chapter 3 looks at GHG emissions across the whole of the Mid Sussex district. It starts with the GHG baseline for the whole district, then considers which stakeholders have influence over emissions and what the role of the Council can be and finishes by outlining two possible net zero pathways that the district could take.

3.1 GHG BASELINE

This section of the report establishes the baseline situation regarding fuel consumption and GHG emissions in Mid Sussex. Consideration is also given to the energy efficiency of the building stock, deployment of local renewable energy technologies, and electrical vehicle (EV) uptake. These factors provide useful context to inform the assessment of potential future trends in later sections of this report.

Key messages

- Buildings and transport – specifically, homes and cars – account for the vast majority of both fuel use and GHG emissions in Mid Sussex.
- Fuel consumption has decreased by around 10% since 2005, while CO₂ emissions have decreased by 32%. This is primarily due to the decarbonisation of grid electricity, which is the result of using less coal and more renewable technologies to generate power in the UK.
- Total GHG emissions for Mid Sussex in 2019 were approximately 736 ktCO₂e. This figure includes carbon dioxide (mostly associated with energy use), methane (mostly associated with waste and agriculture), nitrous oxide (mostly associated with fertiliser), and f-gases (used in refrigeration technologies). Around 80% of emissions are from CO₂ alone. This is consistent with the national average.
- The energy efficiency of the building stock in Mid Sussex is broadly in line with the national average. New buildings are significantly more efficient than older buildings. The Government aims to increase the minimum EPC rating that buildings must achieve in order to be rented, which should help to promote energy efficiency measures – but this will present a considerable challenge given the current performance of the building stock.
- There are a range of renewable technologies in Mid Sussex producing both electricity and heat. The majority are roof- or ground-mounted solar photovoltaic (PV) installations. There is also a significant amount of electricity produced by a single sewage gas facility. The amount of renewable electricity generated is equivalent to around 23 GWh per year. For context, electricity use in 2018 was around 509 GWh.
- Uptake of ultra-low emissions vehicles (ULEVs) has increased exponentially since 2011, and as of 2020 there were nearly 1,000 licensed ULEVs within the District, along with 35 public charging points. While this is an encouraging trend, uptake will need to increase nearly 100-fold by 2050 for Mid Sussex to reach net zero emissions.

3.1.1 Overview of the methodology

The baseline information presented in this section draws from a wide range of public datasets. In particular, it includes information about fuel consumption and CO₂ emissions which is disaggregated to a Local Authority level and published by the Department for Business, Energy and Industrial Strategy (BEIS). This core data has been supplemented, where relevant, with additional local data and further analysis in order to provide a more detailed sectoral breakdown of the results.

Note that, due to the publication schedule of these datasets, a mix of 2018 and 2019 data has been used. In particular, at the time of writing, 2019 data on CO₂ emissions at local authority level has been published, whereas 2019 fuel consumption data at local authority level has not. This is not expected to

affect any of the key take-home points, assuming that there were no radical changes in fuel consumption patterns in that time period.

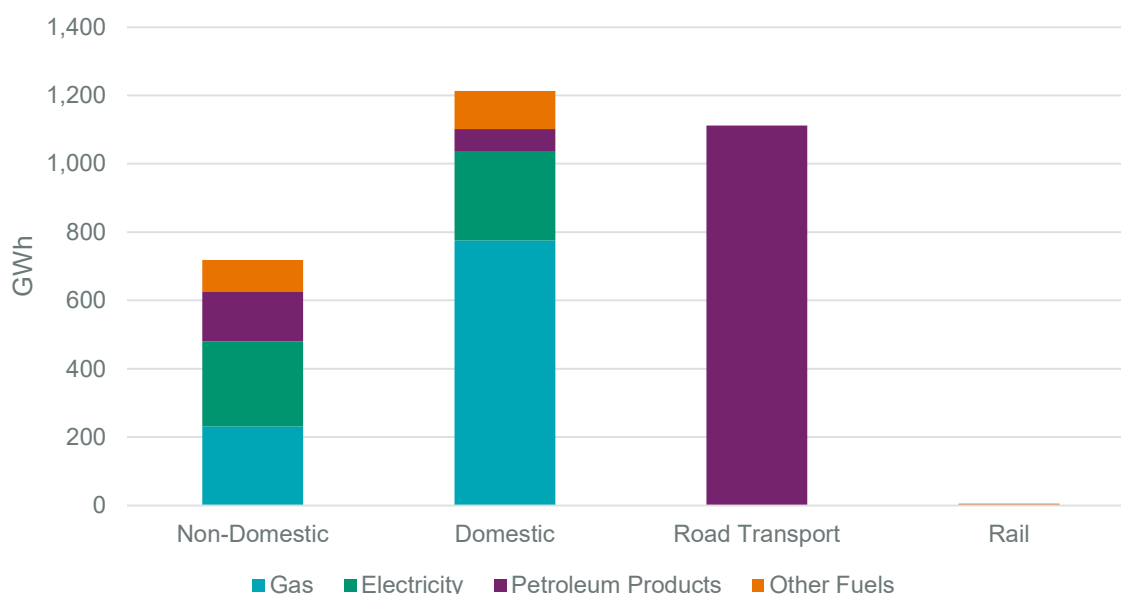
3.1.2 Fuel consumption

The most recent fuel consumption data published by BEIS is for 2018.¹⁰ Results are shown in the table below and illustrated in Figure 25. (Note that the ‘Non-Domestic’ category includes the following categories reported in the BEIS dataset: ‘Industrial’, ‘Commercial’, ‘Public Sector’ and ‘Agriculture’. ‘Other Fuels’ includes ‘Coal’, ‘Manufactured Fuels’ and ‘Bioenergy & Wastes’.)

Table 5. Fuel Consumption by Sector, 2018

	Gas (GWh)	Electricity (GWh)	Petroleum Products (GWh)	Other Fuels (GWh)	Total (GWh)	% of total
Non-Domestic	231	250	145	92	718	24%
Domestic	776	260	66	111	1,213	40%
Road Transport	0	0	1,112	0	1,112	36%
Rail	0	0	2	3	5	<1%
Total	1,007	509	1,326	207	3,048	100%
% of total	33%	17%	43%	7%	100%	

Figure 25. Fuel Consumption by Sector, 2018



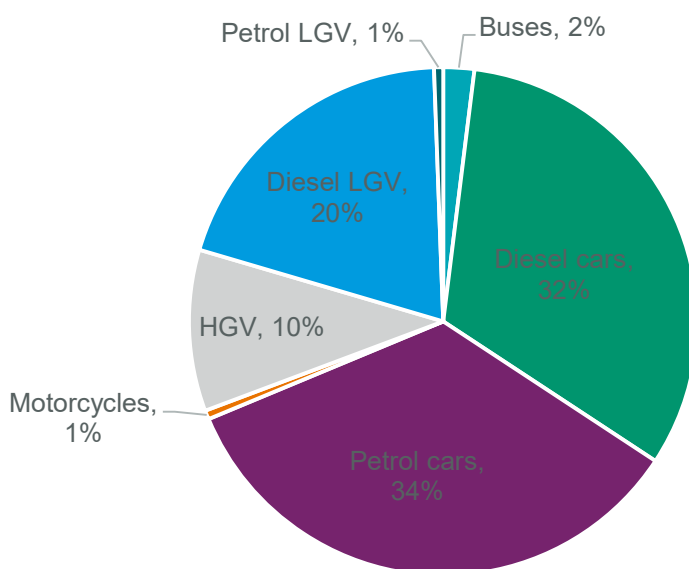
These statistics show that 40% of the fuel used in Mid Sussex in 2018 was associated with domestic buildings. Within the domestic sector, the majority of fuel used was natural gas, which typically supplies space heating and hot water, followed by electricity. Non-domestic buildings and processes/activities accounted for around 24%. This sector exhibits a more diverse mix of fuels compared to the domestic sector. The road transportation sector accounted for around 36% of total fuel consumption. There was also a very small amount of coal and petroleum use associated with rail transportation.

¹⁰ BEIS, ‘Sub-national total final energy consumption data 2005-2018’ (published 2020). Available at: [Sub-national total final energy consumption data - data.gov.uk](https://www.gov.uk/government/statistics/sub-national-total-final-energy-consumption-data)

When considering fuel consumption by fuel type, petroleum products were the largest contributor, accounting for 43% of all fuel used in 2018. The majority of petroleum use was attributed to road transportation (petrol and diesel), although some petroleum products are also used in industrial, commercial, and domestic buildings. Considering that Mid Sussex is a rural district, this could reflect a greater reliance on private transport and a higher proportion of homes that are off the gas grid compared with more urban areas. Natural gas accounted for around 33% of total fuel consumption while electricity accounted for 17%.

Examining road transport in more detail, around 67% of fuel is used in petrol or diesel cars, as shown in Figure 26. Around 20% is used for diesel light goods vehicles (LGVs) and 10% is used for heavy goods vehicles (HGVs). The remainder is associated with buses, petrol LGVs, and motorcycles. Overall, around a third of road transport fuel is currently used for freight, with the remainder used for personal travel.¹¹

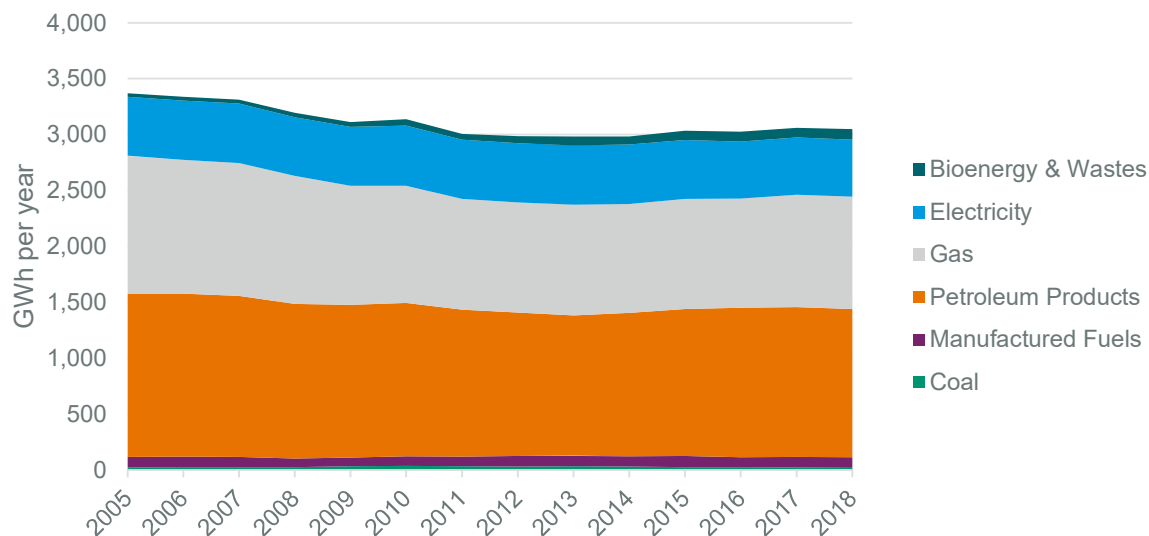
Figure 26. Split of road transport fuel use by vehicle type, 2019



As shown in Figure 27 below, total fuel consumption in Mid Sussex decreased by around 10% between 2005 and 2018 for all sectors and all fuel types, with the exception of fuels derived from bioenergy and waste. In particular, the use of natural gas decreased by around 18% in that time period. This trend is likely due to a wide range of factors but could indicate an increasing prevalence of energy efficiency measures in buildings and industry. When looking at total fuel consumption over this period, it is interesting to note that the reductions mostly occurred in the time period up to around 2011 – from that point fuel consumption has remained largely stable or has even slightly increased.

¹¹ BEIS, 'Sub-national road transport consumption data 2005-2019' (published 2021). Available at: [Sub-national road transport consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/sub-national-road-transport-consumption-data)

Figure 27. Trends in fuel consumption, 2005-2018



The maps below show the spatial distribution of domestic and non-domestic gas and electricity consumption, by Lower Super Output Area (LSOA) and Middle Super Output Area (MSOA) respectively.^{12,13}

¹² BEIS, 'Sub-national gas consumption data 2019' (published 2021). Available at: [Sub-national gas consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹³ BEIS, 'Sub-national electricity consumption data 2019' (published 2021). Available at: [Sub-national electricity consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Figure 28. Domestic electricity consumption by LSOA, 2019. Source: BEIS

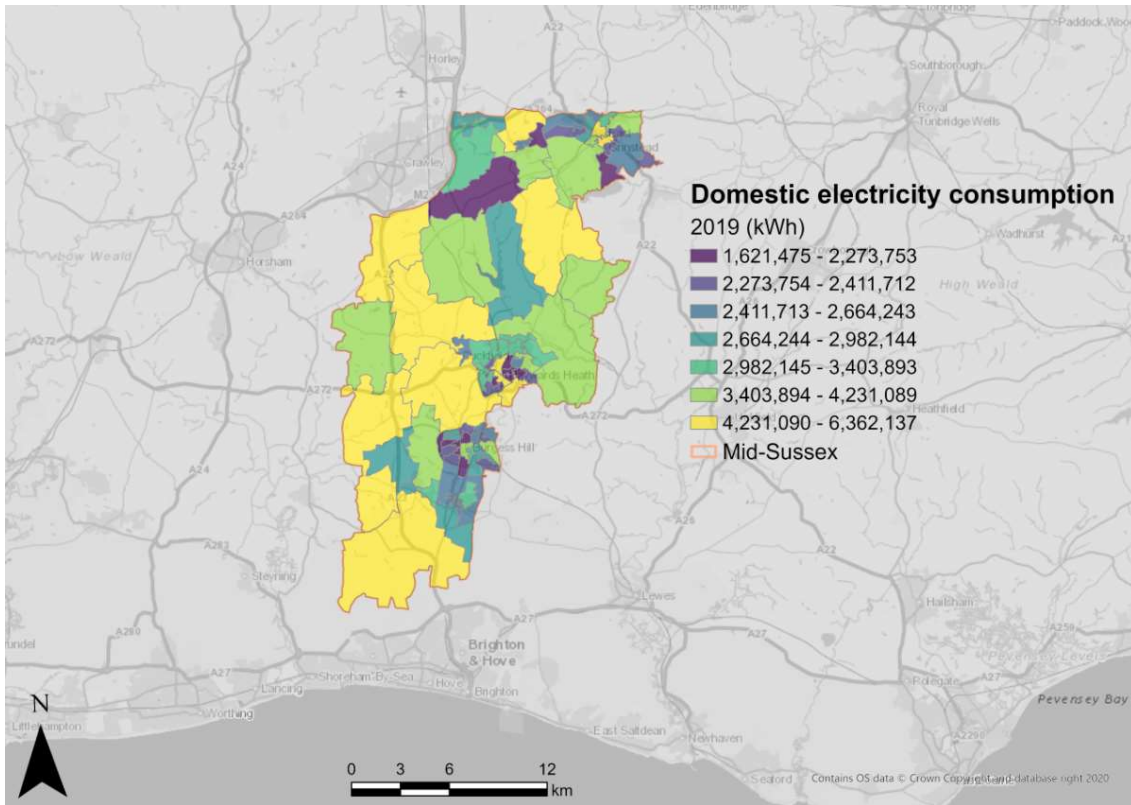


Figure 29. Domestic gas consumption by LSOA, 2019. Source: BEIS

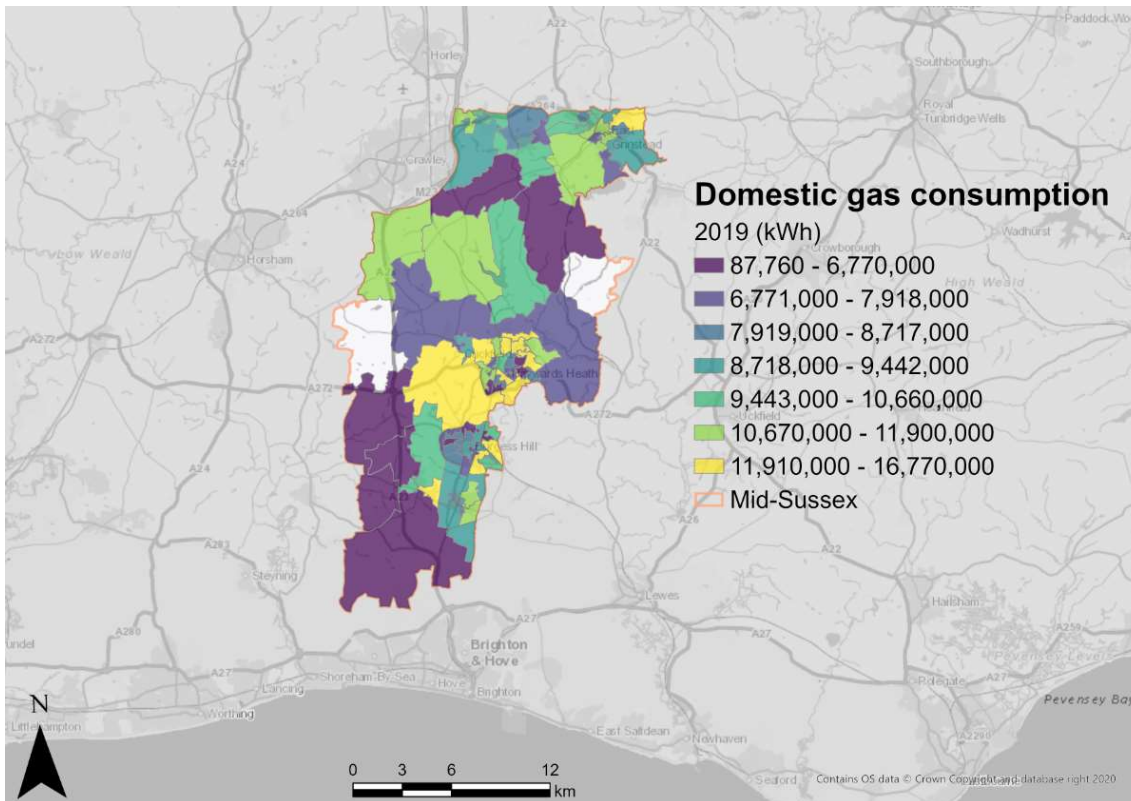


Figure 30. Non-domestic electricity consumption by MSOA, 2018. Source: BEIS

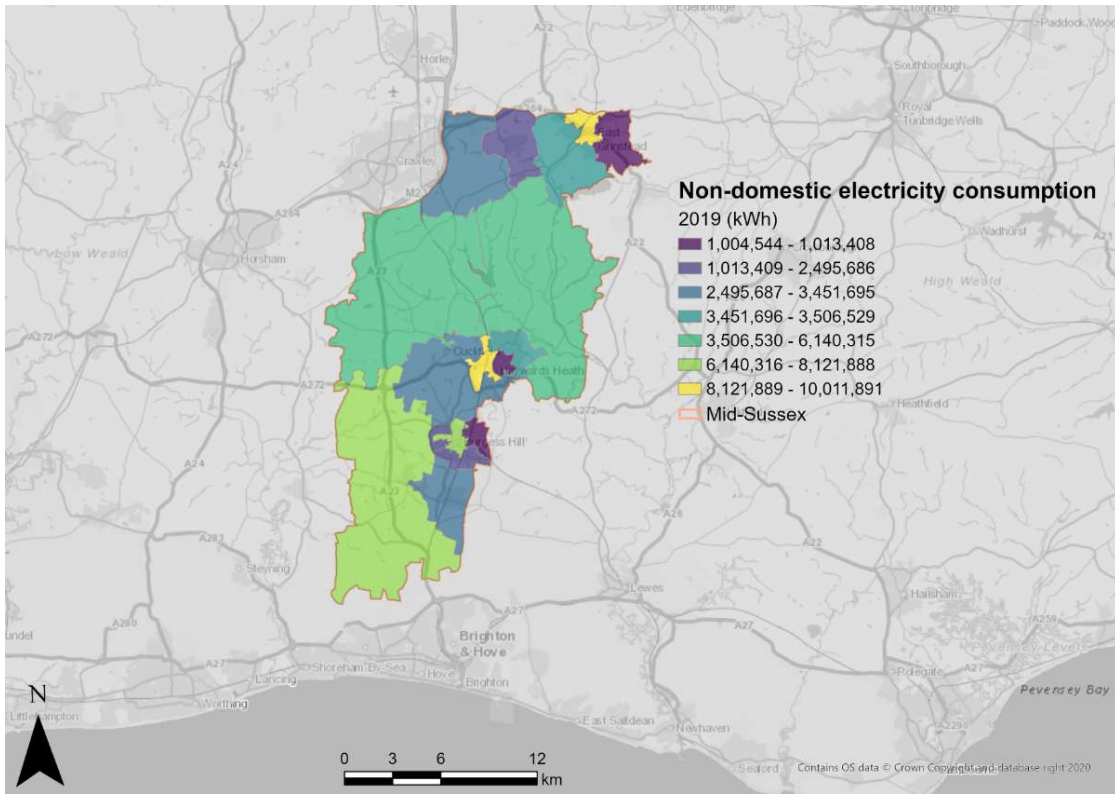
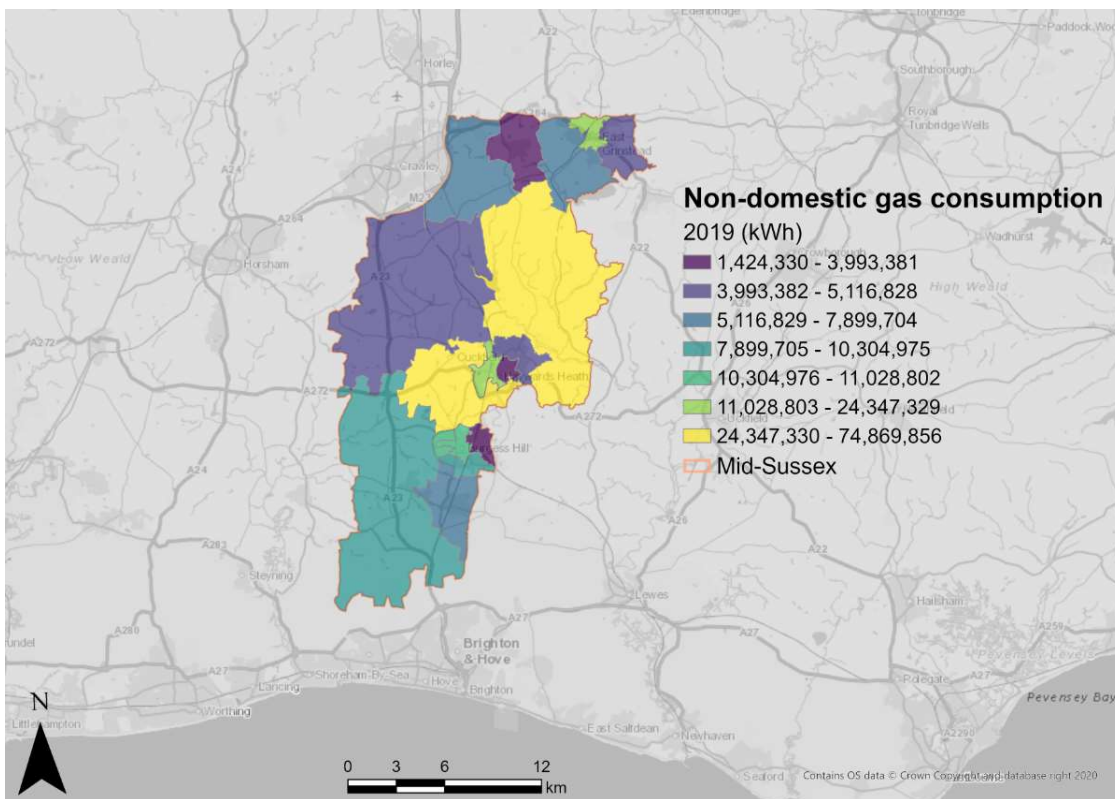


Figure 31. Non-domestic gas consumption by MSOA, 2018. Source: BEIS



3.1.3 Greenhouse gas (GHG) emissions

Information on CO₂ emissions at a local authority level is published annually by BEIS, two years in arrears.¹⁴ The dataset covers sectors and activities that emit CO₂. However, at a national level, CO₂ only accounts for around 80% of total GHG emissions.¹⁵ The remaining 20% comes from:

- Methane (CH₄), which is mostly associated with agriculture (e.g., livestock digestion) and waste management (e.g., organic waste decomposing in landfill);
- Nitrous oxide (N₂O), which is mostly associated with the use of fertilisers; and
- Fluorinated gases (f-gases), which are used in refrigerants and air conditioning systems but can leak out during the manufacturing, operation or disposal process.

Therefore, in order to provide a more comprehensive GHG emissions inventory for Mid Sussex, with a more detailed breakdown of emissions by fuel type and sector, we have taken the BEIS CO₂ data as a starting point and supplemented it with more detailed analysis based on various underlying and additional datasets such as sub-national fuel consumption, waste collection, and renewable energy statistics. These have been used to develop a CO₂e baseline for the district with our proprietary Net Zero Projections (NZZ) tool. Results are presented in Table 6 below. These have been split according to sector to facilitate a like-for-like comparison with the BEIS CO₂ dataset (illustrated in Figure 32).

Table 6. GHG emissions in Mid Sussex by sector and fuel type, 2019

	Natural Gas (ktCO ₂ e)	Grid Electricity (ktCO ₂ e)	Petrol/ Diesel (ktCO ₂ e)	Other/Not Specified ^[1] (ktCO ₂ e)	Grand Total (ktCO ₂ e)
<i>Sectors in the BEIS CO₂ dataset</i>					
Light industry	13.55	18.14		32.09	63.78
Large industrial installations	5.86	3.92		9.62	19.40
Agriculture (CO ₂ from energy use) ^[2]				8.20	8.20
Commercial	17.96	27.29		1.27	46.52
Public sector	11.00	6.77		0.47	18.25
Domestic	147.48	56.05		22.93	226.46
Road transport			291.40		291.40
Railways			0.66		0.66
LULUCF net emissions ^[3]				-70.06	-70.06
Total	195.86	112.16	292.05	4.53	604.61
<i>Additional sectors</i>					
Agriculture (non-CO ₂ gases) ^[2]				40.50	40.50
F-gases ^[4]				30.37	30.37
Waste ^{[4][5]}				42.95	42.95
Domestic Aviation ^{[4][5]}				3.21	3.21
Total				117.04	117.04

Notes:

1. For some sectors, such as agriculture, emissions from energy use are not reported by fuel type, so these are listed in the 'Other/Not Specified' category, even though in reality they are likely to include some natural gas, grid electricity, petrol, or diesel. The 'Other/Not Specified' category also includes some emissions that do not result from fuel use. For example, methane emissions in the waste sector arise due to the decomposition of biological material

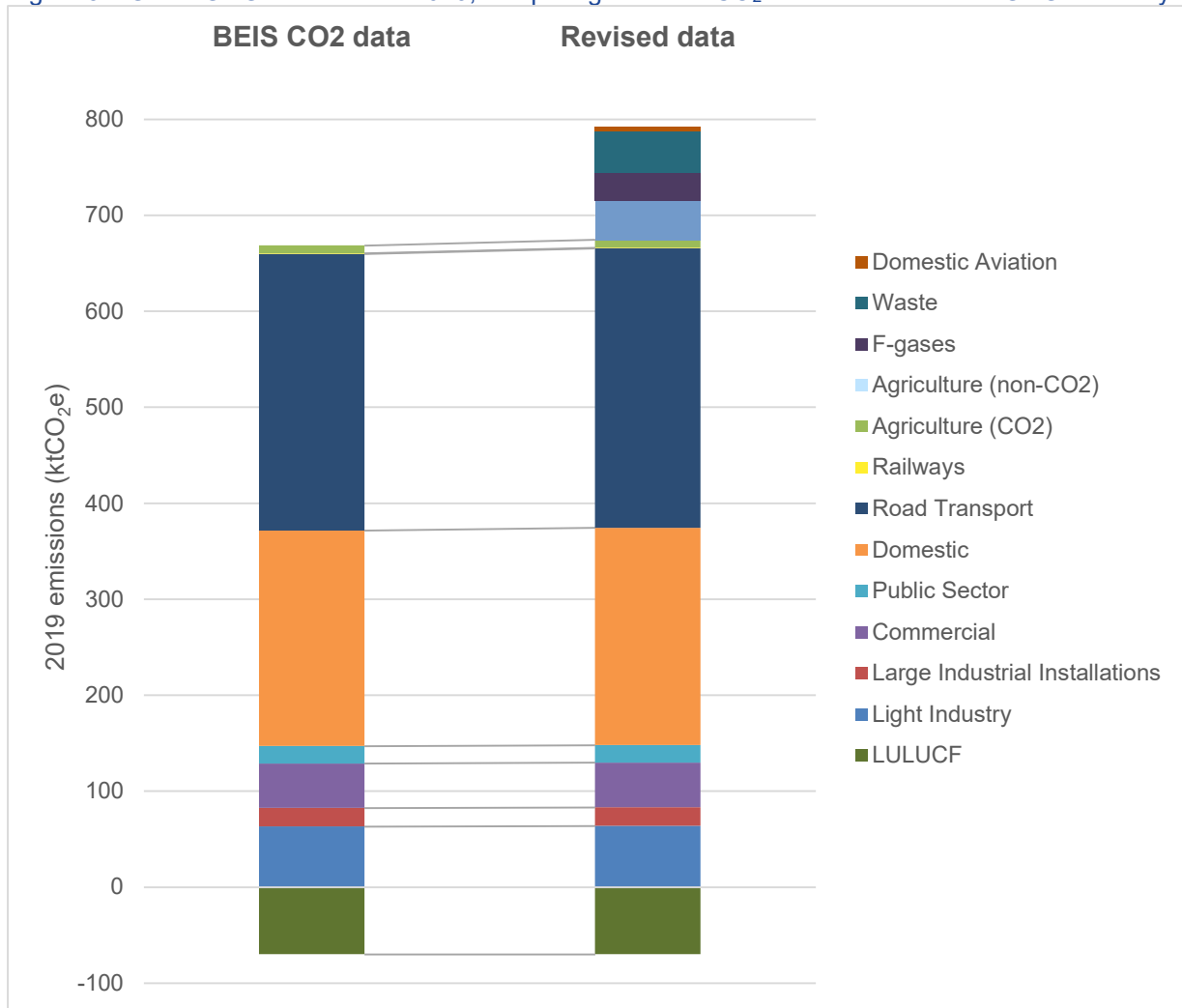
¹⁴ BEIS, 'Emissions of carbon dioxide for Local Authority Areas; (published 2021). Available at: [Emissions of carbon dioxide for Local Authority areas - data.gov.uk](https://www.gov.uk/government/statistics/emissions-of-carbon-dioxide-for-local-authority-areas)

¹⁵ BEIS, '2019 UK Greenhouse Gas emissions' (published 2021). Available at: [2019 UK Greenhouse Gas Emissions, Final Figures \(publishing.service.gov.uk\)](https://www.gov.uk/government/statistics/2019-uk-greenhouse-gas-emissions)

in landfill. Similarly, LULUCF (land use, land use change, and forestry) emissions are affected by soil and plants absorbing CO₂ during respiration.

2. The BEIS CO₂ data includes CO₂ emissions from energy use – that is, fuel use in agricultural facilities and processes – but does not include emissions from methane or nitrous oxide. In the agricultural sector, emissions are dominated by non-CO₂ gases. These were estimated by referencing the NAEI emissions map and converting units of methane and nitrous oxide to tCO₂e.
3. Stands for ‘land use, land use change, and forestry’. This category represents the movement of CO₂ between the atmosphere and different natural ‘reservoirs’ such as forests, soil, etc. Some human-induced effects, such as tilling the soil, result in CO₂ being emitted to the atmosphere, while others, such as planting trees, result in CO₂ being absorbed from the atmosphere. This category quantifies the net impact of all such activities taking place within the Local Authority boundary.
4. Estimate based on national datasets and apportioned to Mid Sussex based on population.
5. Some or all of the emissions from these categories may be classified as ‘indirect’ emissions, and therefore outside the scope of this inventory, if they occur outside of the Local Authority boundary. This would be the case, for instance, if waste generated in Mid Sussex is sent to landfill elsewhere. However, it is not possible to confirm based on available information.

Figure 32. Gross GHG emissions in 2019, comparing the BEIS CO₂ data and the revised GHG inventory



There are a few key differences between the BEIS CO₂ data and the revised inventory:

- For most sectors, there are small (<1%) differences simply due to the use of CO₂e conversion factors rather than CO₂ conversion factors.
- For agriculture, there is a large difference in the results which is due to the inclusion of methane and nitrous oxide.
- F-gases, waste, and domestic aviation are additional sources of emissions that were not included in the BEIS data.



The revised results highlight that road transport and domestic buildings contribute the most to total GHG emissions. Although the domestic sector is more energy-intensive (measured by annual fuel consumption), the rapid decarbonisation of the electricity grid in recent years means that road transport is now the highest emitting sector (see Figure 33).



The next most significant contributions come from light industry, agriculture, and the commercial sector. Energy use in public sector buildings and large industrial installations each comprise a relatively small portion of the overall total – less than the estimated emissions from f-gases, although it should be noted that the latter are based on prorated national datasets rather than locally specific information.



Emissions from waste management and domestic aviation have also been reported, although again, these are based on national datasets. Although they may fall outside the Local Authority boundary, it is possible that MSDC could exert some influence over these emissions e.g., by collaborating with waste collection contractors, or via awareness raising campaigns.

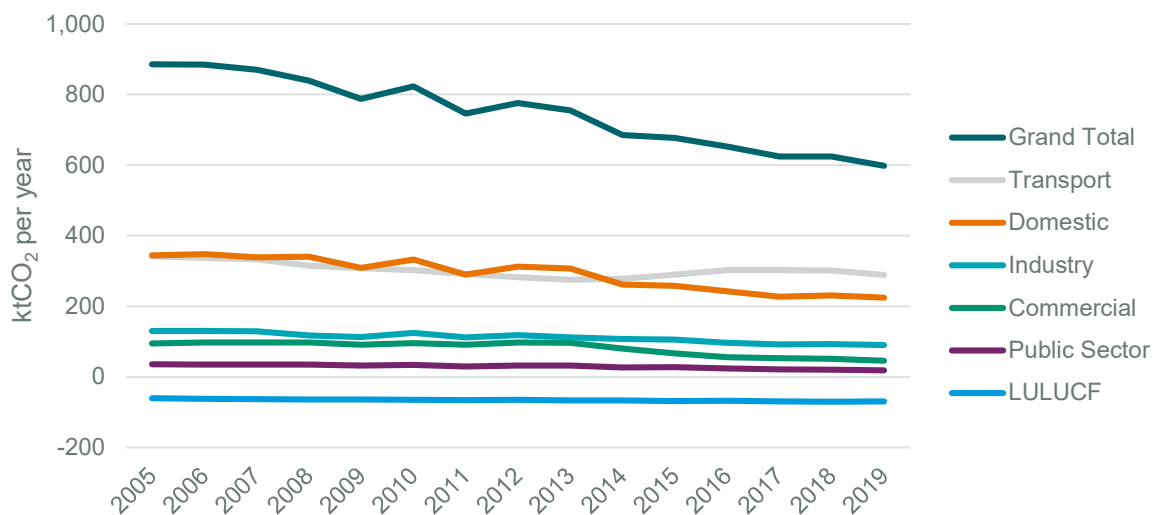


GHG reductions from the LULUCF sector reduce the total net emissions by around 10%. Although this is environmentally beneficial, it also serves as a reminder of the sheer scale of GHG emissions reductions that would need to occur in order to reach net zero emissions overall. Given that Mid Sussex is comparatively rural, and already includes important natural landscapes and national parks, there may be less scope for additional CO₂ sequestration to be achieved via 'natural' methods.

In order to consider trends over time, we have referred to the BEIS Local Authority CO₂ dataset. As stated previously, this only considers CO₂ rather than all GHGs; however, it still offers useful insight into major changes that have occurred since 2005.

As shown in Figure 33 below, total CO₂ emissions in Mid Sussex decreased by around 32% from 2005-2019. This is slightly below the national and county-wide averages, both of which saw around a 36% decrease in the same time period. By far the most significant change in emissions was due to decarbonisation of the national electricity grid, associated with the phasing out of coal and increase in renewable power generation. While electricity use in Mid Sussex decreased by around 4% in that time, CO₂ emissions per unit of grid electricity dropped by 55%. This highlights the importance that grid decarbonisation will play in the future when there is likely to be a widespread shift to the use of electricity for other purposes such as heating and transportation. Other changes in emissions are primarily associated with trends in fuel consumption, as the carbon intensity (kgCO₂/kWh) of most fuels other than electricity remains comparatively stable.

Figure 33. Trends in CO₂ emissions in Mid Sussex, 2005-2019



The maps on the following pages show the spatial distribution of CO₂, CH₄ and N₂O emissions at a 1x1km grid level, as published within the National Atmospheric Emissions Inventory (NAEI) mapping database.¹⁶

¹⁶ NAEI, 'UK Emissions Interactive Map' (2021). Available at: [UK Emissions Interactive Map \(beis.gov.uk\)](https://ukemissionsinteractive.beis.gov.uk/)

Figure 34. Total CO₂ emissions in Mid Sussex, 2019. Source: NAEI

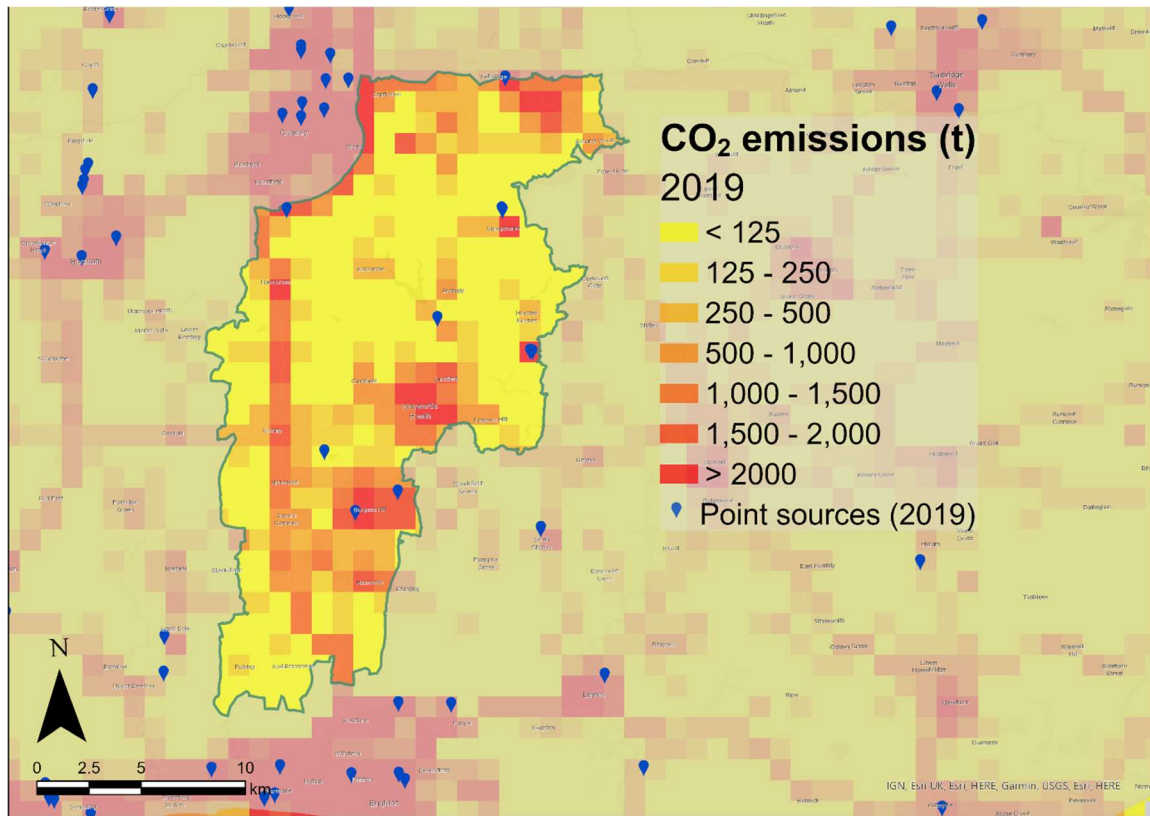


Figure 35. Domestic CO₂ emissions in Mid Sussex, 2019. Source: NAEI

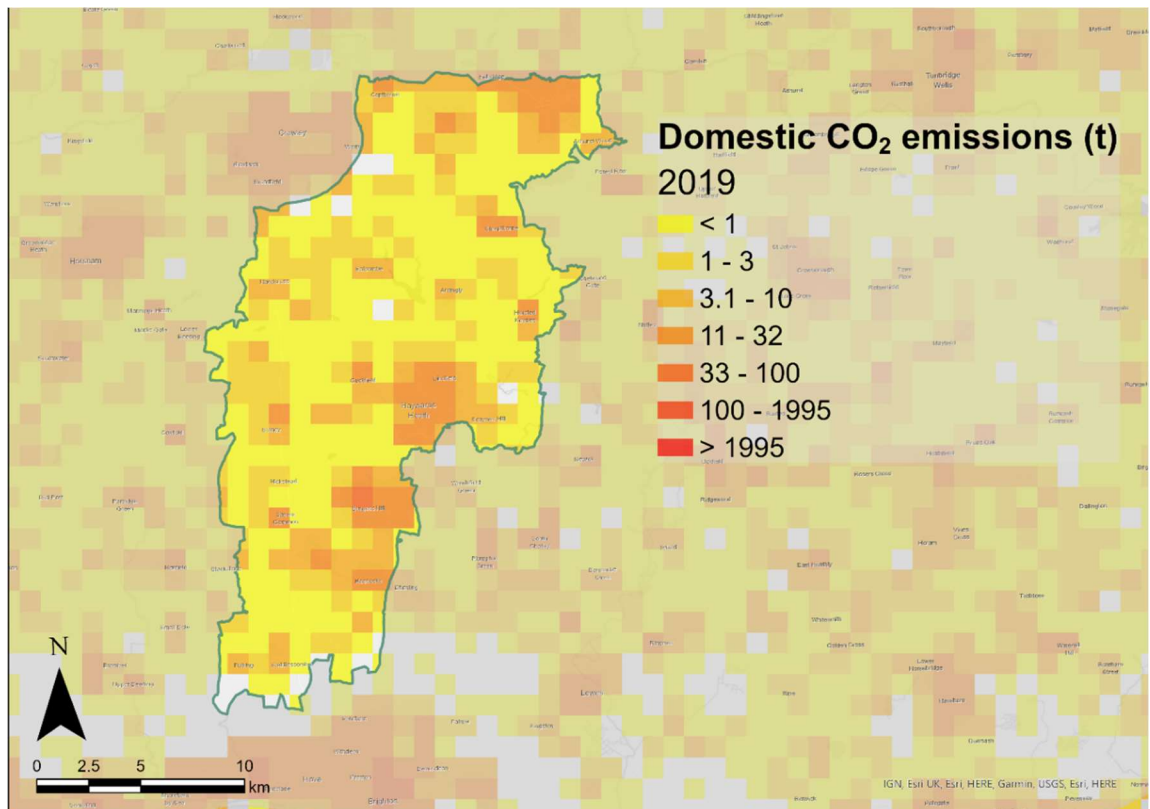


Figure 36. CO₂ emissions from road transport in Mid Sussex, 2019. Source: NAEI

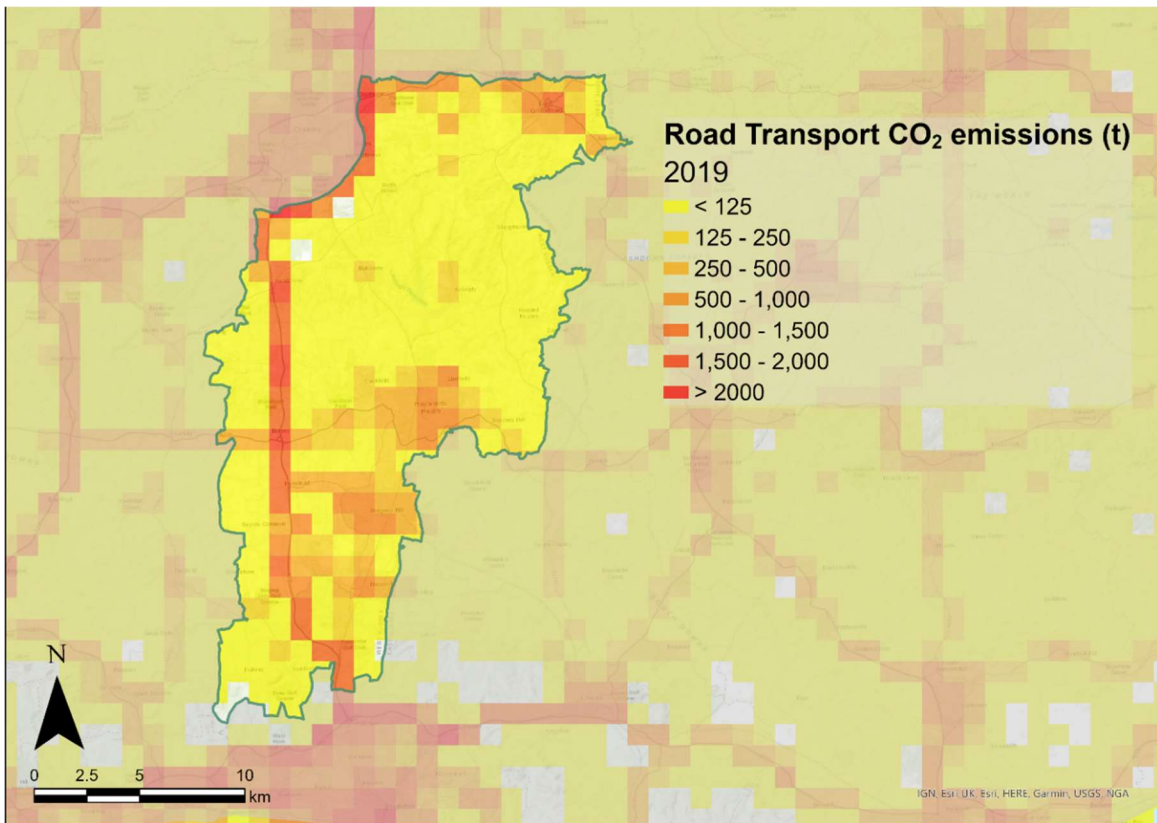


Figure 37. CO₂ emissions from manufacturing in Mid Sussex, 2019. Source: NAEI

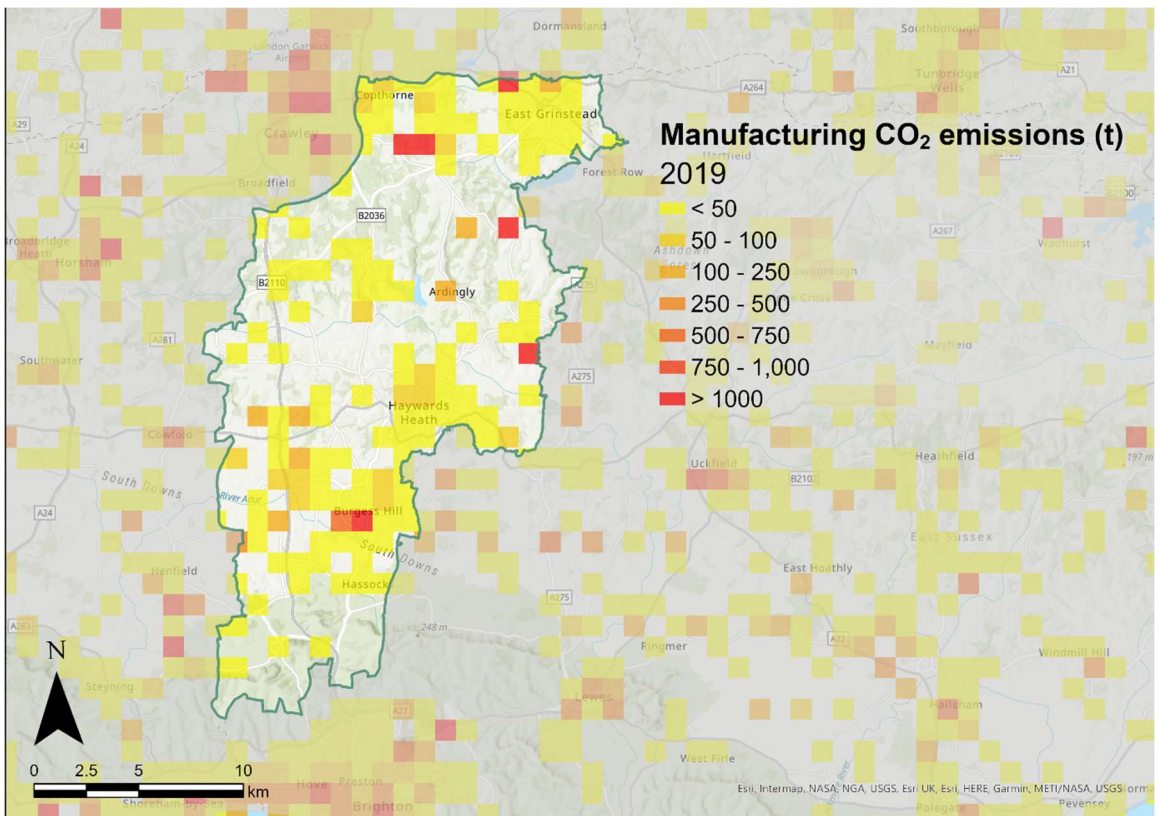


Figure 38. Methane (CH₄) emissions in Mid Sussex, 2019. Source: NAEI

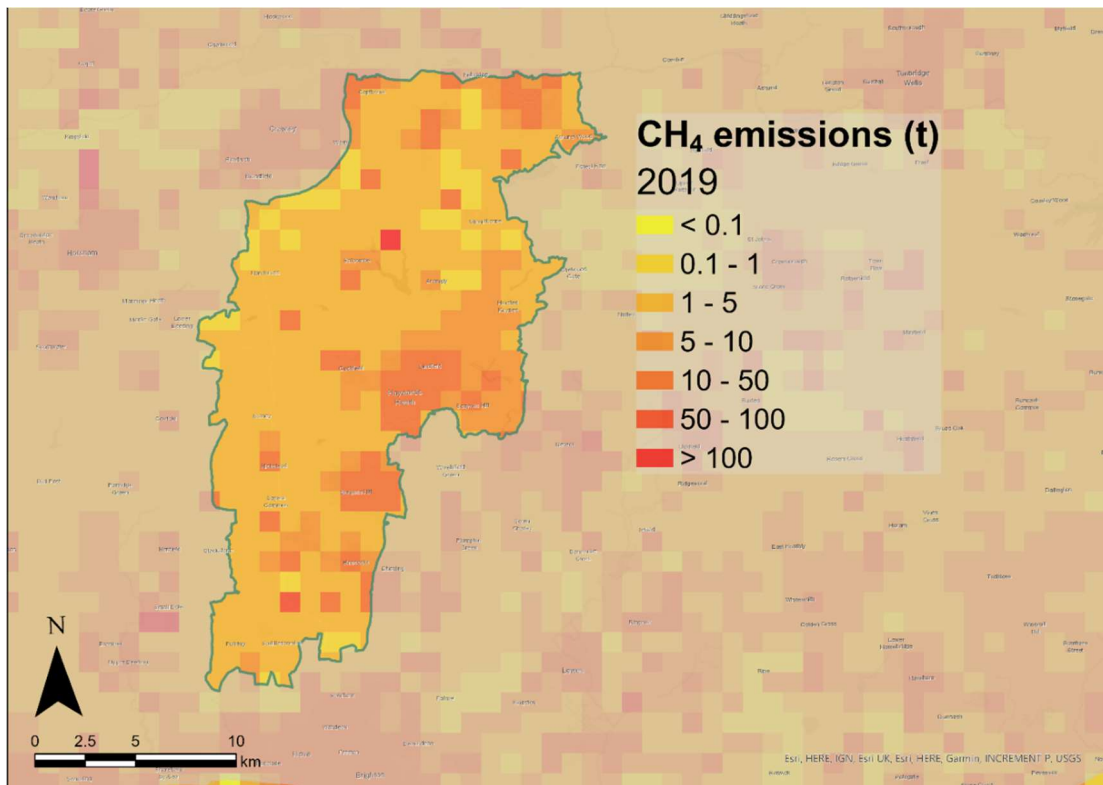
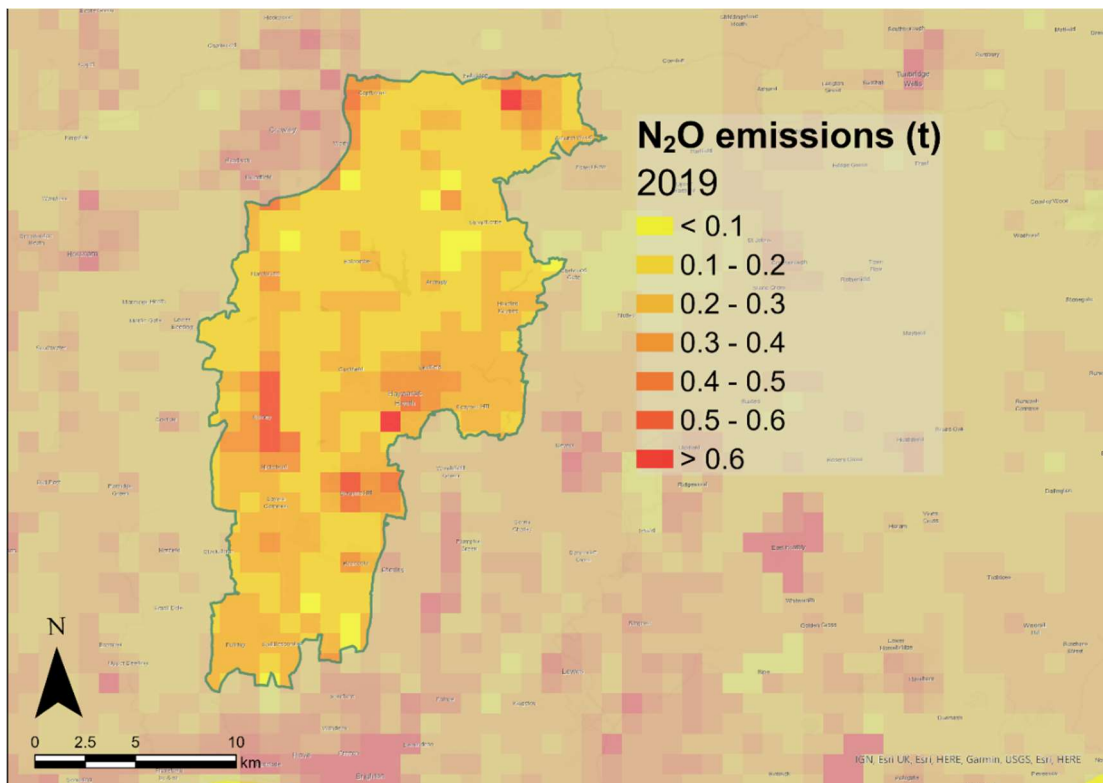


Figure 39. Nitrous oxide (N₂O) emissions in Mid Sussex, 2019. Source: NAEI



The maps indicate that CO₂ emissions are highest around the main town centres in Haywards Heath, Burgess Hill, and East Grinstead, which is not surprising given the rural nature of the district. Road transport emissions are dominated by the A23 and M23 where it encircles Crawley. The map of total CO₂ emissions shows that there are relatively few large point sources of CO₂, which typically include high energy users such as power stations, large industrial facilities, etc. The map of emissions from combustion in manufacturing also shows a small number of hotspots which correlate to these point sources' further details are available on the NAEI website. There is comparatively less spatial variation in CH₄ and N₂O emissions; these gases are predominantly associated with agricultural activities which are distributed across the district.

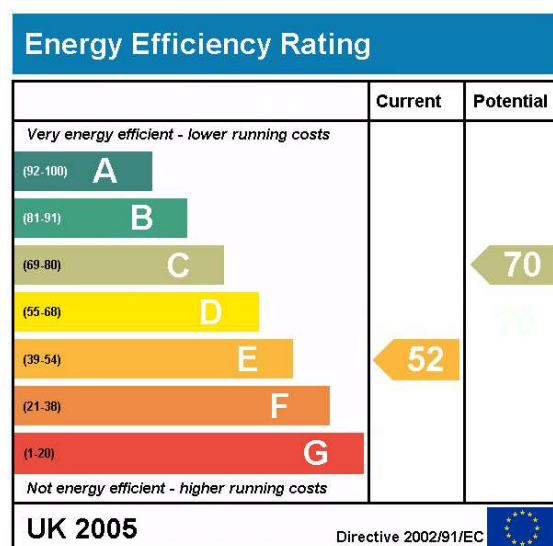
Note: Separate maps have been provided for CO₂, CH₄ and N₂O because the NAEI does not include f-gases which form part of Mid Sussex's total GHG footprint. Emissions of f-gases are assumed to correlate spatially with buildings, particularly non-domestic buildings which are more likely to use refrigerants and air conditioning systems.

3.1.4 Energy efficiency in buildings

In order to understand the relative level of energy efficiency of the existing building stock, energy performance certificate (EPC) data was retrieved from the Ministry of Housing, Communities and Local Government website.¹⁷

What are EPCs?

EPCs provide a modelled estimate of the annual fuel consumption and CO₂ emissions from buildings, based on observations about their size, layout, and construction. Although the results do not necessarily indicate the actual fuel consumption or emissions from a given building – this depends on many factors including occupant habits – EPCs allow a like-for-like comparison between buildings with equivalent geometry. EPCs present an energy efficiency ranking for the building, based on a scale from A (best) to G (worst), as illustrated in the image on the right. Note that domestic EPCs show the potential rating that could be achieved if energy efficiency measures were introduced, but this is not the case for non-domestic EPCs.



The publicly available datasets are updated regularly and, at the time of writing, span the time period from 2008 through March 2021. Collectively, they cover the majority of the existing stock, as all buildings are required to undergo an assessment to obtain an EPC when they are constructed, sold, or rented; however, it is likely to exclude buildings constructed prior to 2008 that have not been sold or rented in that period. The dataset also contains some duplicate entries, where buildings have undergone multiple assessments. Duplicates were removed after being sorted by date, to ensure that only the most recent assessment was included in this analysis.

EPC ratings are not only useful to get a sense of the overall energy efficiency levels of existing buildings, but also because they underpin the Minimum Energy Efficiency Standards (MEES) regulations that came into effect in 2018. The MEES regulations are intended to encourage property owners and landlords to improve the energy performance of their buildings by making it unlawful to grant new tenancies for properties with an EPC rating less than 'E'.¹⁸ (Exemptions apply and consideration is given to the maximum improvement that can be achieved via cost-effective measures.) The requirement was extended to all (new and existing) domestic tenancies in 2020, and it is expected that the same will

¹⁷ <https://epc.opendatacommunities.org/>

¹⁸ [Minimum Energy Efficiency Standards \(MEES\) for Landlords \(elmhurstenergy.co.uk\)](https://www.elmhurstenergy.co.uk/minimum-energy-efficiency-standards-meets-for-landlords/)

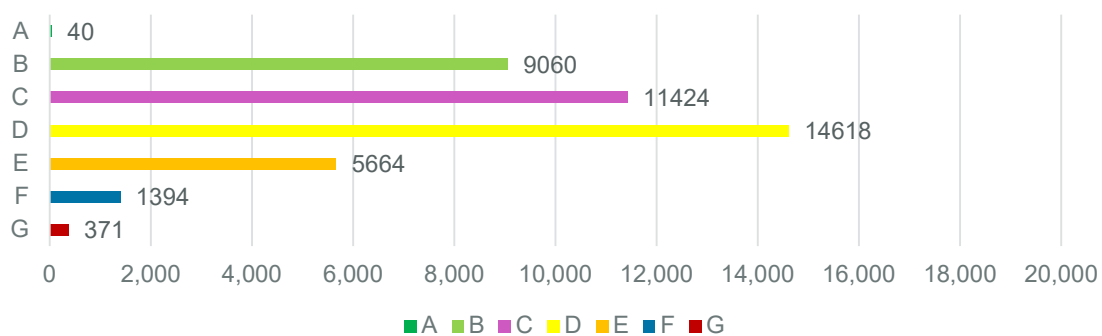
apply for commercial tenancies from April 2023. Over time, the minimum EPC rating will progressively increase. The Government has set out an ambition that, by 2030, most rented non-domestic properties will be required to achieve a 'B' rating and homes will achieve a 'C' rating.^{19,20} Local Authorities are responsible for ensuring compliance in the domestic sector and have the ability to issue fines for non-compliance with MEES. Responsibility for the non-domestic sector lies with the Local Weights and Measures Authorities.

The MEES regulations are relevant to this study because, as shown in Section 3.1.3, existing buildings account for a large proportion of total GHG emissions, and there are relatively few other mechanisms for Local Authorities or the Government to influence the energy performance of such buildings.

3.1.4.1 Domestic buildings

As shown in Figure 40, the median 'current' EPC rating for buildings in Mid Sussex is D, which is the same as the national average. The median 'potential' EPC rating is B. Although it is not possible to directly translate this into an equivalent carbon saving, for context, the National Energy Efficiency Database indicates that adopting common, cost-effective energy efficiency measures can result in a c. 5-15% reduction in heating demands.²¹ More ambitious retrofitting schemes can achieve much greater improvements, reducing heating bills by 80% or more. This suggests that there is considerable scope for improvement within the domestic stock.²²

Figure 40. Current domestic EPC ratings



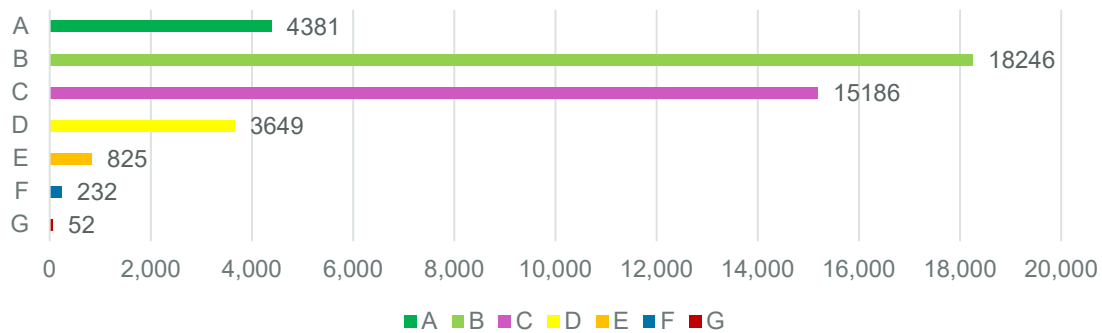
¹⁹ [Improving the energy performance of privately rented homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/improving-energy-performance-of-privately-rented-homes)

²⁰ [Non-domestic Private Rented Sector minimum energy efficiency standards: EPC B implementation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/non-domestic-private-rented-sector-minimum-energy-efficiency-standards)

²¹ EPCs provide recommendations for energy efficiency measures that are tailored to each building. These include measures such as wall, roof, or floor insulation; upgrading to double or triple glazing; upgrading the heating system; installation of PV or solar thermal technologies, etc.

²² The actual carbon savings would depend on which energy efficiency measures are implemented. In practice, these modifications are often costly, and uptake has historically been low in the absence of government or Local Authority funding / subsidies. Local Authorities generally have limited influence over the existing building stock, although it is possible to reduce barriers via permissive Local Plan policies and permitted development rights.

Figure 41. Potential domestic EPC ratings

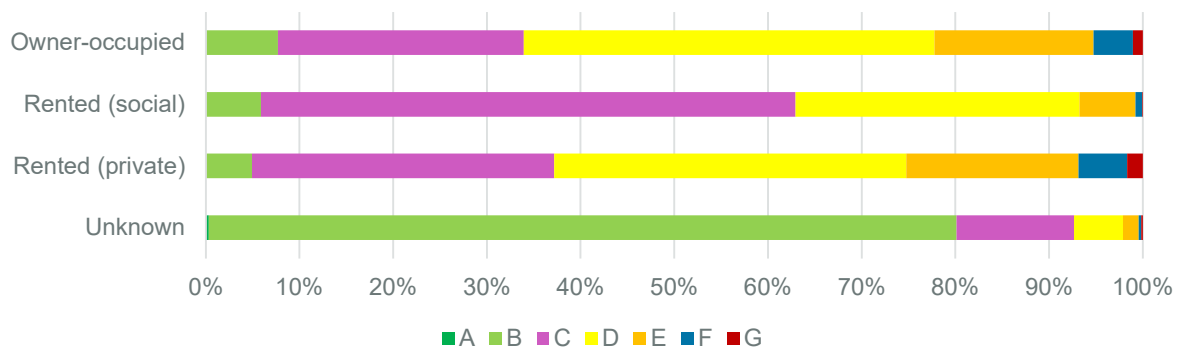


EPC data for England and Wales indicates that there is considerable variation between EPC ratings for buildings of different types and age of construction, and this is also the case for Mid Sussex. Larger properties, and those that are detached or semi-detached, tend to use more energy than smaller ones. New buildings are more energy efficient than older buildings, due to the progressive increase in standards set out within the Building Regulations; statistics for 2019 suggest that energy costs for new build homes are roughly half that of existing homes.²³ This indicates that significant effort would be required to achieve the Government’s aim of bringing as many buildings as possible up to a ‘C’ rating by 2035.

Considering energy efficiency by tenure, the domestic EPC data for Mid Sussex suggests that social rented housing tends to be more efficient than owner-occupied or private rentals. This is also true across the country as a whole, due to a variety of factors, which are likely to include differences in the typical type and age of property but could also relate to the availability of funding for energy efficiency improvements.

(Note that the ‘Unknown’ category includes EPCs where there is no record of tenure, but mostly comprises new buildings where the tenancy is not yet determined. This likely explains the higher level of energy efficiency in this category.)

Figure 42. Current domestic EPC ratings by tenure

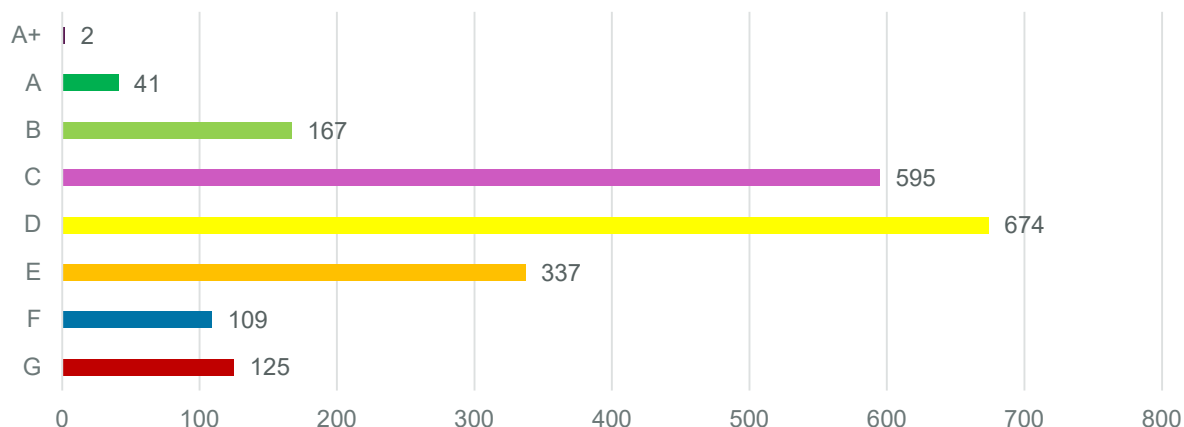


3.1.4.2 Non-domestic buildings

The median non-domestic EPC rating in Mid Sussex is D, and the majority (over 60%) have either a C or a D rating. Perhaps unsurprisingly, the distribution is not symmetrical; there are more buildings with lower ratings than higher ratings. As with the domestic stock, this broadly mirrors the national picture.

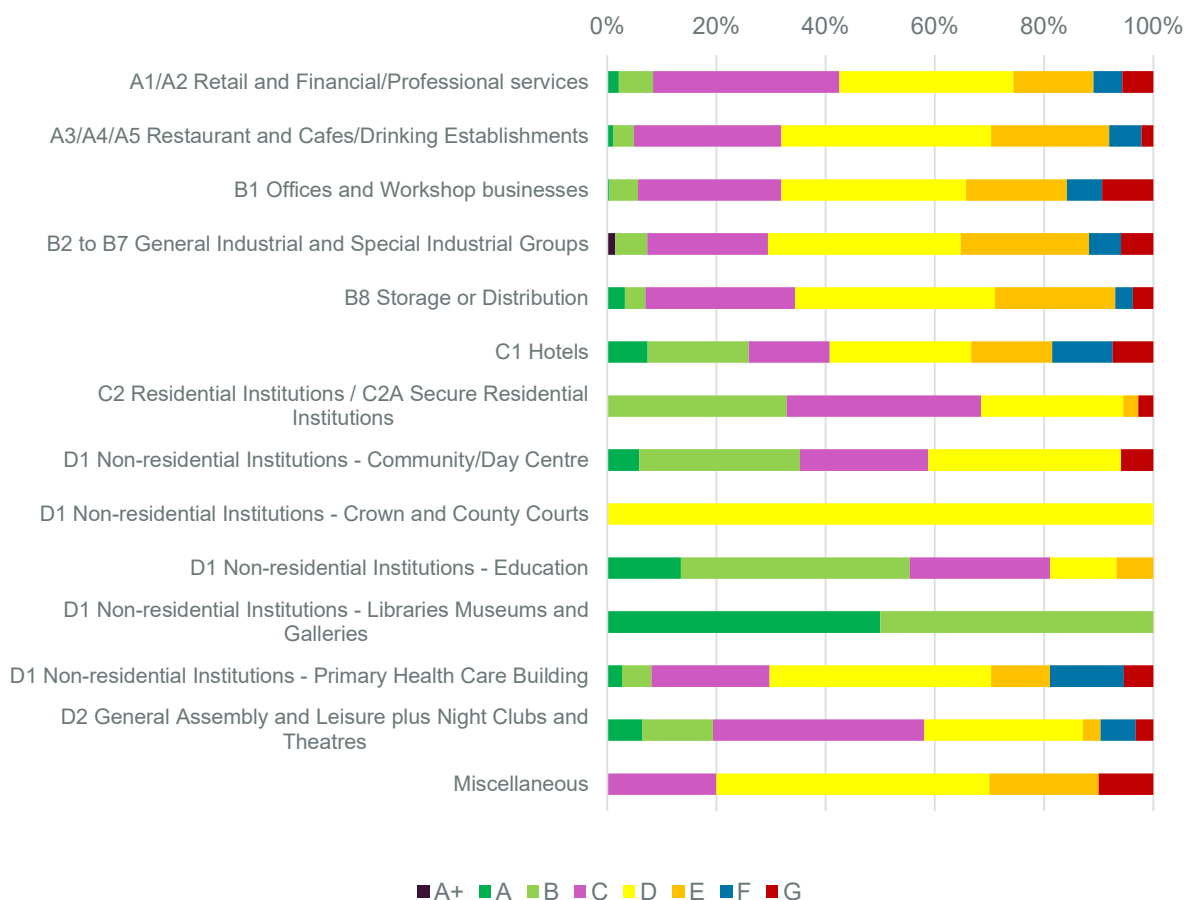
²³ Office for National Statistics, ‘Energy efficiency of housing in England and Wales’ (2021). Available at: [Energy efficiency of housing in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/housing/articles/energy-efficiency-of-housing-in-england-and-wales)

Figure 43. Non-domestic EPC ratings



Non-domestic EPCs report the planning use category of a property, rather than tenure. Figure 44 shows a breakdown of results by use, indicating the proportion of buildings that achieve different ratings. (Note that this is affected by how many buildings of each type are included in the dataset. For instance, the result for ‘D1 Non-residential institutions – Crown and County Courts’ is based on the EPC record for just one building.) These results reinforce one of the key messages of the domestic EPC analysis, which is that a significant portion of the existing stock would need to be upgraded by 2030 in order to meet the Government’s ‘B’ rating requirement.

Figure 44. Non-domestic EPC ratings by use category



3.1.5 Renewable energy

To estimate the number, size, and type of renewable energy installations within Mid Sussex, we have referred to the following sources:

- The Regional Renewable Statistics (RRS) – Published annually by BEIS, this dataset only includes renewable electricity technologies and excludes those that only produce heat. The most recent data is for the end of 2019.
- Renewable Heat Incentive (RHI) statistics – This dataset covers technologies that provide renewable heat, including ground and air source heat pumps, biomass, and solar hot water.
- The Renewable Energy Planning Database (REPD) – An up-to-date list of renewable energy planning applications published quarterly by BEIS.

Results are shown in Table 7 below.

As at the end of 2019, there were 2,138 electricity-producing renewable energy installations in Mid Sussex. The vast majority of these, in terms of number of installations, were solar photovoltaics (PV). It is likely that most PV installations are small, roof-mounted systems, although the REPD indicates that there are four operational ground-mounted PV farms in the district as well.

In addition to PV, there are five onshore wind turbines with a total capacity of around 0.02 MW. The small capacity suggests that these are small- or micro-scale turbines, which may reflect the fact that much of the district is located within the sensitive landscapes of the High Weald AONB and South Downs National Park.

There is also one sewage gas plant within Mid Sussex. Because this technology has a comparatively high output (MWh per unit of installed capacity), the single sewage gas plant generates around a third of the renewable electricity in the district.

Table 7. Renewable electricity technologies in Mid Sussex, as at end of 2019

	Number of Installations (#)	Installed Capacity (MW)	Generation (MWh per year)
Photovoltaics	2,132	19.61	17,753
Onshore Wind	5	0.02	44
Sewage Gas	1	0.8	5,388
Total	2,138	20.44	23,186

Source: BEIS, RRS

The RRS indicates that there are no hydropower, anaerobic digestion, wave, tidal, landfill gas, municipal solid waste, animal biomass or plant biomass installations in Mid Sussex. However, because the RRS only records technologies that produce electricity, we have referred to other sources for information on renewable heat technologies:

- The REPD indicates that there has been one planning application submitted for an air source heat pump (ASHP) based communal heating system that would supply care home residences in the Downlands Park Care Home in Hayward Heath.
- RHI statistics suggest that there are 45 non-domestic RHI installations in Mid Sussex, with a total installed capacity of around 8MW, and 206 domestic RHI installations, for which the capacity is not reported.

While it is impossible to confirm the types and sizes of individual RHI installations in Mid Sussex based on public data, for context, Table 8 and Table 9 present information based on the nation-wide RHI statistics. For non-domestic RHI installations, the vast majority of applications (over 80%) are for biomass boilers, mostly small (<200kW) or medium (200-1000kW) scale. Most of the other applications are for water or ground source heat pumps (GSHPs). For domestic RHI installations, the majority of applications are for ASHPs, with the remainder roughly evenly split between GSHPs, biomass boilers and solar thermal systems.

Table 8. Split of technology types among non-domestic RHI applications

Technology Type	% of nationwide total
Small Solid Biomass Boiler (< 200 kW)	62%
Medium Solid Biomass Boiler (200-1000 kW)	19%
Large Solid Biomass Boiler (> 1000 kW)	1%
Solar Thermal (< 200 kW)	2%
Small Water or Ground Source Heat Pumps (< 100 kW)	7%
Large Water or Ground Source Heat Pumps (>100 kW)	2%
Biomethane	<1%
Biogas	4%
Air Source Heat Pumps	3%
CHP	<1%
Deep Geothermal	<1%

Source: BEIS, RHI Deployment Data April 2021, Table 1.1

Table 9. Split of technology types among domestic RHI applications

Technology Type	% of nationwide total
Air source heat pump	62%
Ground source heat pump	14%
Biomass systems	14%
Solar thermal	10%

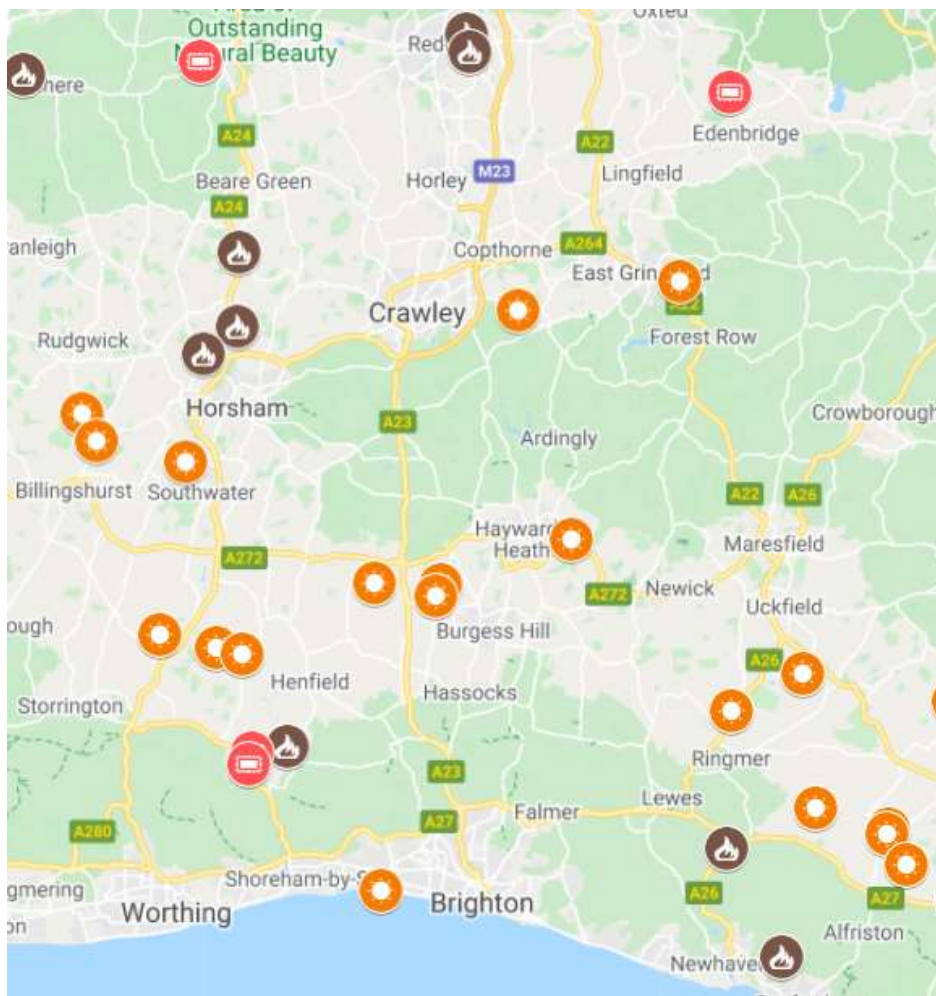
Source: BEIS, RHI Deployment Data April 2021, Table 2.1

The table below summarises the large-scale renewable energy installations in Mid Sussex, both electricity and heat, that are listed within the REPD. A map of these renewable energy installations, based on data collected by the UK Renewables Map website, is provided in Figure 45.

Table 10. Large-scale renewable energy installations, as listed in the REPD

Operator (or Applicant)	Site Name	Type	Capacity (MWelec)	Development Status
INRG Solar	Land Parcel North of Goddards	PV	5	Operational
REPOWER	Balcombe & Chiddinglye Solar Park	PV	5	Operational
Haymaker Energy	Majors Hill/Turners Hill Solar Farm	PV	1.1	Operational
S4N Worsted	Worsted Farm	PV	5	Operational
British Solar Renewables	Coombe Solar Farm	PV	15.3	Planning Permission Granted
Dacorar Southern	Goddard's Green	PV	4.4	Planning Permission Granted
Kingscote Valley Ltd.	Moatlands	GSHP	0.12	Planning Application Submitted
Eden (Downlands) Limited	Downlands Park	Heat Network (ASHP)	N/a	Planning Application Submitted

Figure 45. Locations of renewable energy technologies in Mid Sussex. Source: UK Renewables Map

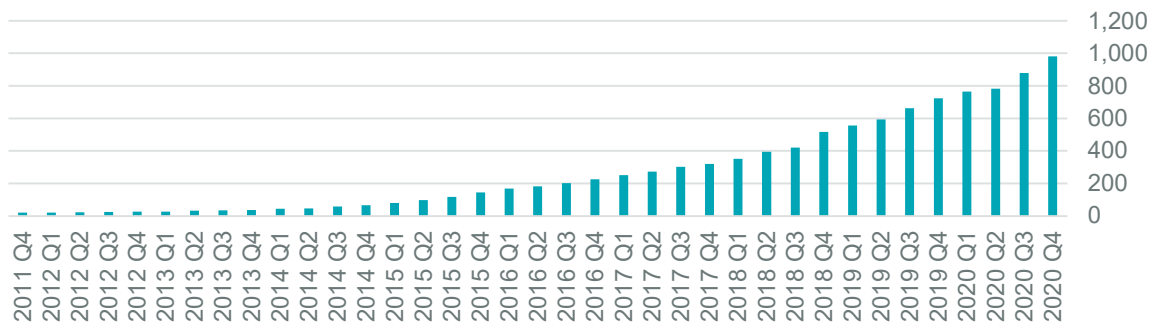


To put these figures into context, it is helpful to consider the annual electricity demand of Mid Sussex, which was roughly 509 GWh as of 2018. Renewables therefore provide the equivalent of 4-5% of the district’s annual electricity demands. In practice, some of this electricity feeds into the national grid, so it is not possible to state the exact proportion of demand that is met through renewables. Although it is not necessary for each Local Authority to meet all of its own electricity needs via technologies that are installed within the red line boundary, it is nonetheless clear that energy demands would need to reduce significantly, and renewable uptake would need to radically increase, in order for Mid Sussex to achieve net zero emissions.

3.1.6 Ultra-low emission vehicles (ULEVs)

ULEV uptake has increased exponentially in recent years across the UK, albeit from a low base, and Mid Sussex is no exception. As shown in Figure 46, by the end of 2020 there were 982 licensed ULEVs in the district, compared with just 20 in 2011. Around half of these (486) were battery electric vehicles (BEVs).

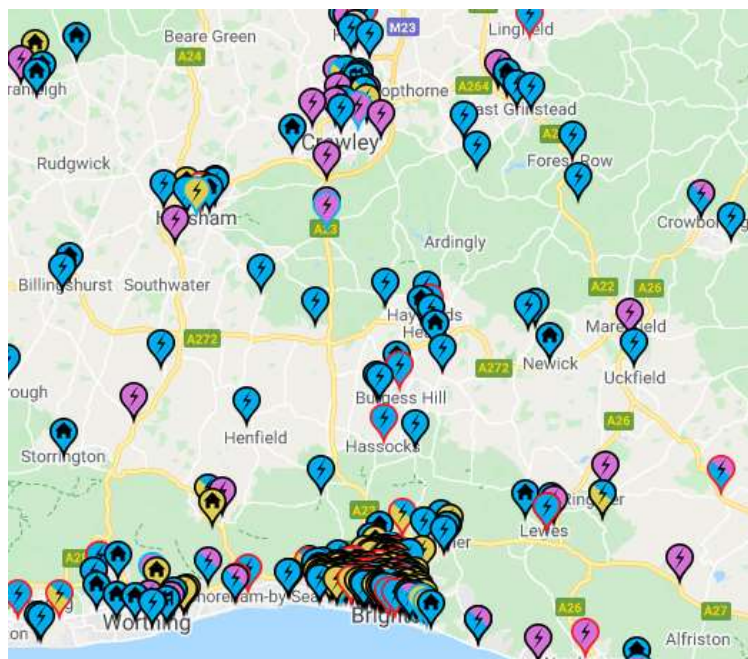
Figure 46. Licensed ULEVs in Mid Sussex, 2011-2020



Although this is an encouraging trend, ULEVs still represent a tiny proportion (<1%) of licensed vehicles in Mid Sussex. The UKPN Future Energy Scenarios envision that there could be nearly 100,000 EVs in Mid Sussex by 2050 – which would require not only a transformation in the use of renewable electricity and hydrogen powered vehicles, but also a decrease in the number of journeys travelled, and the rate of private vehicle ownership.

As of April 2021, there were 35 public charging points in Mid Sussex, including 5 rapid charging points. These are shown in Figure 47 below.

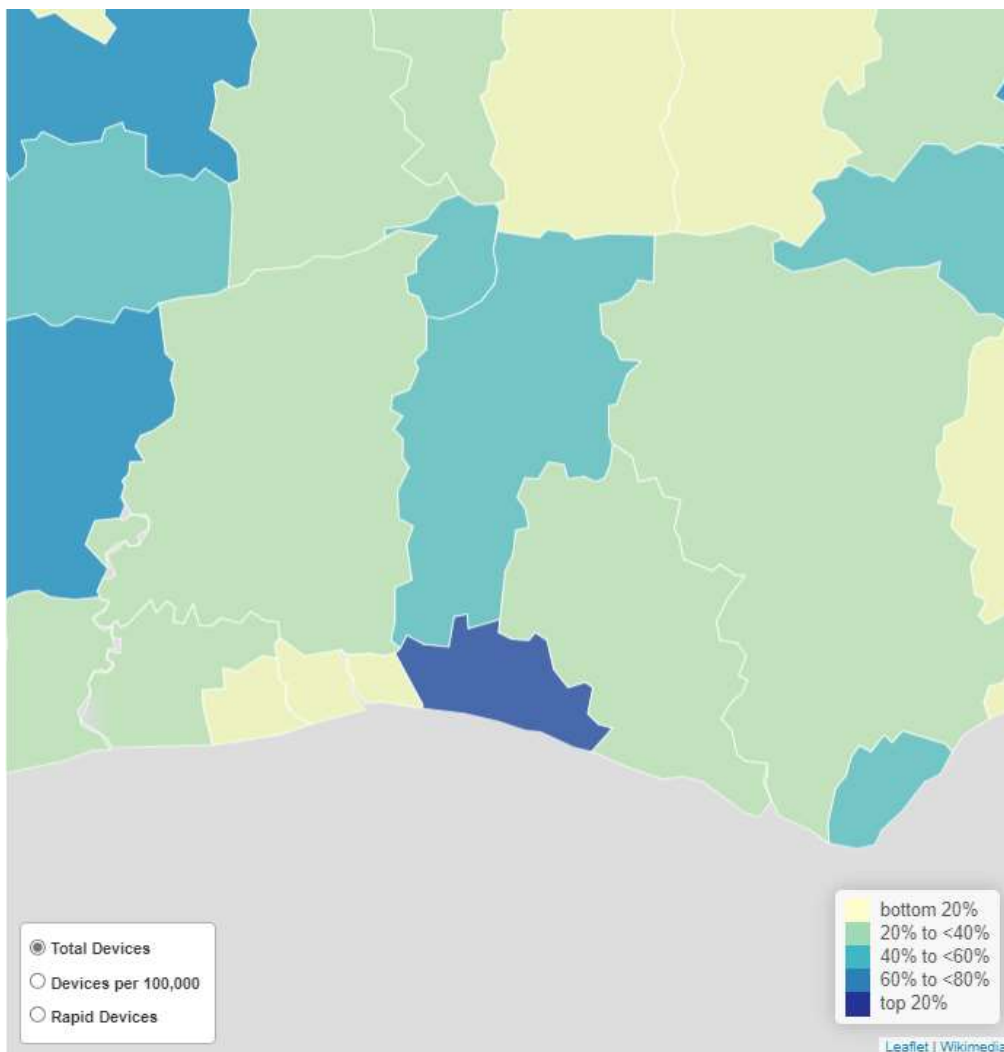
Figure 47. Locations of public charging points in Mid Sussex and surrounding area. Source: Zap-Map



Considering the district’s population, this equates to around 23 public charging points per 100,000 head of population.²⁴ As illustrated in Figure 48, this is roughly equivalent to other local authorities in the UK, and higher than several of the more rural surrounding local authorities.

²⁴ maps.dft.gov.uk/ev-charging-map/

Figure 48. Density of public charging points by Local Authority. Source: DfT



It is anticipated that the price of EVs could converge with that of traditional combustion engines within the next few years. This would create a ‘tipping point’ in consumer choices and require a huge increase in EV infrastructure and renewable energy provision within a very short timescale. West Sussex County Council has published an EV Strategy that envisions 70% of cars to be electric by 2030 and identifies ways that the Council can support the transition.²⁵ One of the key factors of the Integrated Action Plan for Mid Sussex will be to identify ways that MSDC can similarly play its part.

3.2 INFLUENCE MAPPING

This section looks at what the key drivers are that affect GHG emissions across the whole district and which stakeholders have most influence and control over them. This will then inform the development of the net zero plan.

3.2.1 Drivers of change

The UK is committed to achieving a 100% reduction in net GHG emissions by 2050. This is a legal requirement as per the Climate Change Act 2008. The previous 80% reduction target was revised

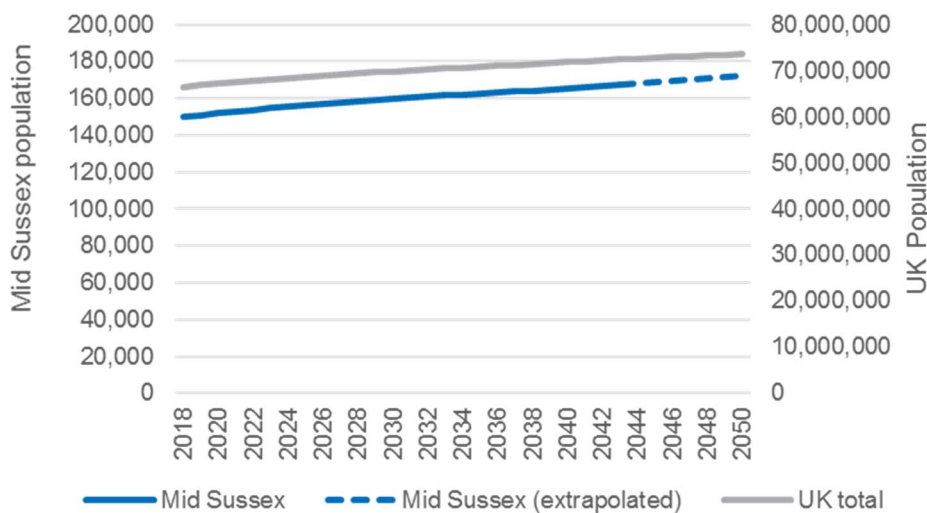
²⁵ [Electric vehicles - West Sussex County Council](#)

upwards in 2019. The Climate Change Committee (CCC) provides evidence and advice on how this can be achieved.

In 2019, MSDC pledged to take local action on climate change in order to support the national net zero target. Building on the Sustainability Strategy produced in 2018, the Council voted to establish a sustainability and climate change panel to provide advice on these topics. Section 3.1 identifies all sources of GHGs in the district, which is a first step towards being able to mitigate, or reduce, those emissions.

Achieving GHG emissions reductions, while also responding to the needs of a growing population, and maintaining economic development, is a significant challenge. The ONS predicts that the population of Mid Sussex, similar to the rest of the UK, could increase by c. 14-15% in the next three decades (see Figure 49). Higher incomes, new buildings and greater use of electronic appliances all tend to increase energy demands. Although improvements in technology, energy efficiency measures, and better awareness of environmental issues can help to reduce energy demand in some sectors, these are likely to be offset without further policy interventions.

Figure 49. Population projections for 2018-2050 (source: ONS)



Of course, there are many unknowns – factors such as energy prices and weather changes, for example, are hard to predict and can influence energy demand in either direction. However, the general picture includes significant headwinds.

Figure 50. common drivers of change for GHG emissions

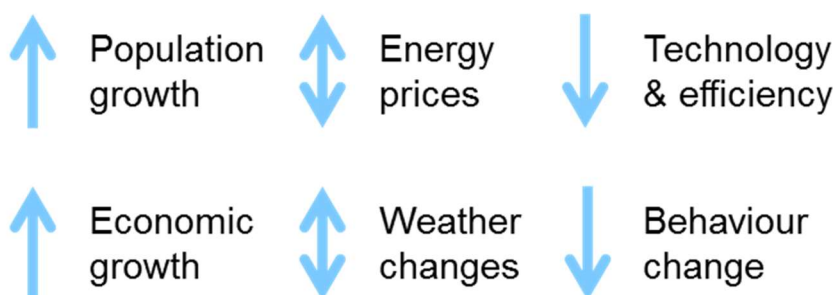
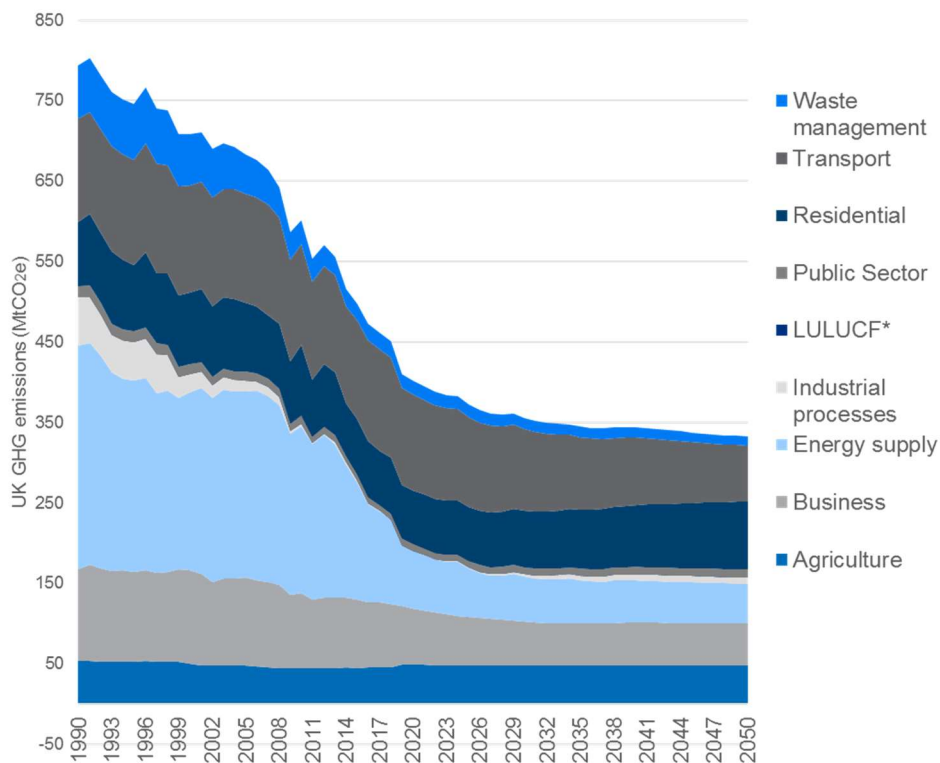


Figure 51 shows projections of UK-wide GHG emissions based on a ‘Reference Scenario’ produced by BEIS, which accounts for population and economic growth, fuel prices, and other national trends.

Figure 51. Projections of UK-wide GHG emissions (Source: BEIS Energy and Emissions Projections - Reference Scenario)



It shows that, in a Business-as-Usual (BAU) scenario, emissions at a national scale would fall fairly rapidly in the coming years despite rising energy demands, largely due to the electrification of heating and vehicles, and a switch towards renewable electricity, but the reductions will then tend to level off. By 2050, there would be marginal improvements, with a significant ‘gap’ to net zero emissions. Bridging the gap to net zero by 2050 will require urgent action to be taken in all sectors, across all policy areas. This can only be achieved through close collaboration among national, regional, and local governments, public, private, and voluntary sector organisations, communities, individuals, businesses, researchers, and innovators.

Many of the changes that will take place are outside of MSDC’s direct control, but this report is intended to highlight the main drivers of emissions in Mid Sussex, and who has influence/powers to tackle GHG emissions in different sectors. These are broken down by topic area as follows:

- Buildings
- Transport
- Energy & Utilities
- Waste
- Land Use & Environment

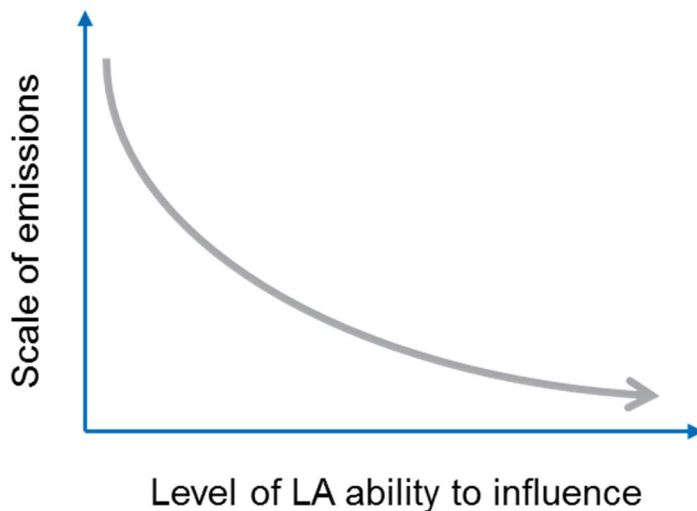
Future emissions will also be dictated by the policy landscape. This includes policies at the national, regional (e.g., county-level, the Southeast region) and local (i.e., district) level. A number of national-level policies have been announced in the last year, including the Government’s Net Zero Strategy, Industrial Decarbonisation Strategy, Transport Decarbonisation Strategy and Heat and Buildings Strategy. Key plans and policies at the regional level include the West Sussex Energy Strategy, Bus Strategy and Transport Plan. At the local level, key documents include the Mid Sussex District Plan, Sustainability Strategy and the Sustainable Economic Strategy currently being developed. More information on these can be found at **Appendix A**.

3.2.2 Opportunities for local authorities to influence GHG emissions

Typically, UK local authorities are only directly responsible for a small proportion of GHG emissions. In Mid Sussex, as explained in the Section 3.1, public sector emissions account for roughly 2-3% of the total, and this proportion is fairly typical (note: these are Scope 1 and 2 emissions which are predominantly associated with buildings (council offices, public buildings, and housing) and don't include scope 3 emissions, which may take place outside the area boundary).

As a result, there is often an inverse relationship between the level of control they exert, and the scale of emissions reduction that they can achieve (see Figure 52).

Figure 52. Diagram illustrating the inverse relationship between level of control and scale of emissions



However, Local Authorities have a wide range of options for exerting indirect influence over emissions that they do not directly control, as set out in Figure 53.

Figure 53. typical options for councils to influence area wide GHG emissions (source: Adapted from Local Authorities and the Sixth Carbon Budget, 2020²⁶)



The division of responsibility between district and county council affects where district-led decarbonisation is feasible and effective. Figure 54 below illustrates how responsibility is generally shared between English district and county councils, in policy areas which are most relevant to decarbonisation.

²⁶ <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget>

Figure 54. Responsibilities of a district council in relation to a county council (responsibilities with potential environmental impact). Adapted from: Institute for Government, 2021²⁷.

Responsibility	District	County
Arts and recreation	Yes	No
Building regulations	Yes	No
Community safety	Yes	Yes
Council tax and business rates	Yes	No
Economic development	Yes	Yes
Education and skills	No	Yes
Emergency planning	Yes	Yes
Environmental health	Yes	No
Highways and roads	No	Yes
Housing	Yes	No
Licensing	Yes	No
Planning	Yes	Yes
Transport	No	Yes
Waste collection and recycling	Yes	No
Waste disposal	No	Yes

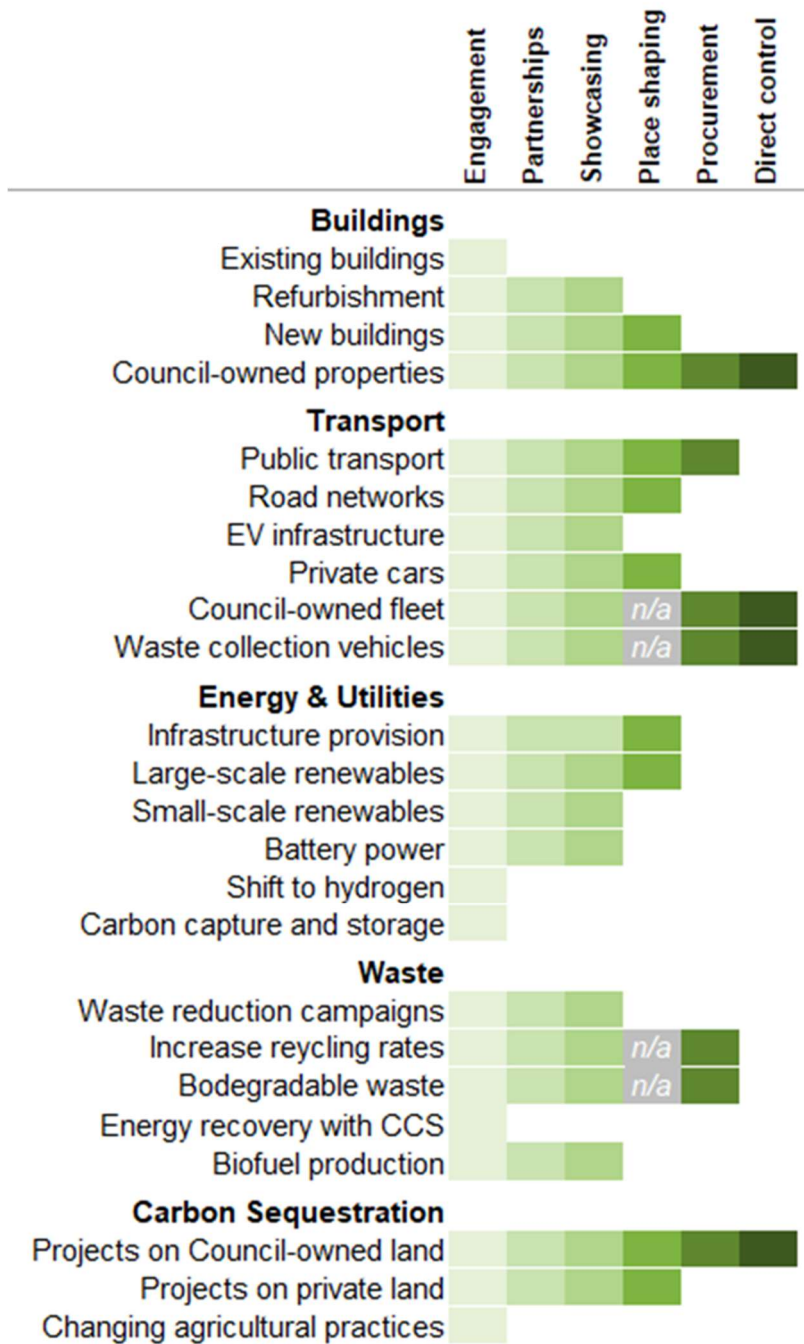
To summarise:

- District Councils are responsible for building regulations and planning, which would impact carbon emissions from the built environment (and, to a lesser extent, transport). They also have influence over carbon emissions from council housing that they own and/or operate. They can indirectly support carbon reduction through business support activities and licensing. Although responsibility for highways and roads is more within the remit of the Highways Agency, Local Authorities do have the power to establish Clean Air Zones and Low Emission Zones.
- County Councils are responsible for more strategic road and infrastructure planning, so have more influence over transport emissions. They are responsible for waste disposal whereas District Councils are in charge of waste collection and recycling; this means that District and County Councils can collaborate on waste reduction initiatives, awareness campaigns, and so on. Both can influence emissions from waste via waste contracts and procurement and would play a role in approving energy from waste or anaerobic digestion projects that can produce low carbon energy.

Figure 55 below summarises more specifically how MSDC can influence decarbonisation across key policy areas. The colour coding is used to indicate the ways that the Council can play a role. Indirect methods of influence are shown in lighter green and direct methods in darker green. Grey shading with 'n/a' means that a method is not applicable or not likely to be used.

²⁷ <https://www.instituteforgovernment.org.uk/explainers/local-government>

Figure 55. MSDC influence over district-wide emissions



The figure highlights that the Council has the most control over its own properties and vehicle fleet, although it is understood that not all of these are both owned and operated by MSDC (for more information, see Section 2.2 on influence mapping within MSDC).

MSDC also has an influential role in its capacity as a Local Planning Authority (LPA), setting planning policy and determining the spatial strategy for the district. This is primarily relevant to energy and sustainability standards for new developments but can also affect longer-term development in existing towns and villages. It is also one of the key ways that the Council can contribute towards electricity grid decarbonisation and increasing carbon sequestration – by identifying suitable areas for large-scale renewable energy installations and afforestation.

Overall, however, much of the Council's influence will be more reliant on engagement with stakeholders to promote carbon reduction projects, showcasing best practice, raising awareness, partnerships and lobbying for change.

The following sections of this chapter provide more detail on each of the policy topic areas, describing the types of changes that need to occur to reach net zero, key policy drivers, major challenges, and important stakeholders. This will be used to inform the development of future carbon pathways for MSDC and a feasibility assessment of reaching net zero.

3.2.3 Other key stakeholders

The sections above clearly show that the Council cannot deliver net zero across the district by itself but will need to work closely with a range of other stakeholders to make net zero a reality. These stakeholders are listed in Figure 56, and expanded on in subsequent sections focusing on different sectors.

Figure 56. Key net zero stakeholders at the national, regional and local level

	Domestic	Commercial	Industrial	Public Sector	Agriculture	Waste & Wastewater	Road transport	Other transport	Land use/ Environment	Power & Utilities
National	MHCLG (Building Regs)	MHCLG (Building Regs)	MHCLG (Building Regs) BEIS	MHCLG (Building Regs)	DEFRA Environment Agency	DEFRA Environment Agency	Department for Transport National Highways (Highways England) Office of Rail and Road Traffic Commissioner, DVLA (regulator for commercial bus services)	Department for Transport Office of Rail and Road Network Rail	DEFRA Environment Agency National Park Authorities	National Grid Ofgem Ofwat HNDU
Regional/ County-wide	-	C2C LEP	C2C LEP	C2C LEP	C2C LEP	West Sussex County Council (waste disposal) Serco (contractor)	West Sussex County Council Bus operators: Compass Bus, Metrobus, National Express, etc.	Govia Thameslink Railway	South Downs National Park Authority High Weald AONB	UKPN Southern Water Southern Gas Scotie Gas Networks
Local (public sector)	MSDC Building Control MSDC Planning Dep't MSDC Housing	MSDC Building Control MSDC Planning Dep't MSDC (Licensing & Business)	MSDC Building Control MSDC Planning Dep't MSDC (Licensing & Business)	MSDC Building Control MSDC Planning Dep't NHS, schools, etc. Neighbouring LAs	MSDC Planning Dep't MSDC Environmental Health	MSDC (waste collection) MSDC Environmental Health	MSDC (parking and licensing)	-	MSDC Environmental Health Parish Councils	-
Local (other)	Private individuals Tenants' associations Landlords/ Landowners	Local businesses Business associations	Local businesses Business associations Industry groups/bodies	Private individuals Community groups	Local businesses Business associations	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners People and Nature Network (PANN)	Private individuals Local businesses Landlords/ Landowners Community energy groups Solar Together
Cross-cutting	NGOs, charitable organisations, academic and research organisations, community groups, etc.									

3.2.3.1 Buildings

What needs to happen to reach net zero?

- Energy demand in all buildings needs to decrease significantly – including both new and existing buildings. This will require much higher levels of insulation and airtightness and more efficient building services (e.g., heating, ventilation, hot water, and cooling), along with smart controls and energy management systems. It is also likely to require changes in user behaviour.
- All buildings will need to be capable of operating with 100% renewable energy, which will involve replacing all heating systems and other building services that rely on fossil fuels. Until and unless hydrogen gas is commercialised, it is likely that heat pumps and district heating will be the main options for heat decarbonisation. Uptake of small-scale renewables and battery storage will also need to be radically scaled up.
- The construction industry as a whole, which is currently responsible for around 60% of waste produced in the UK, will need to adapt to new methods of design and construction that prioritise refurbishment, design for disassembly, and contribute towards a circular economy.

Key policy drivers of emissions in the sector are set out in Table 11.

Table 11. Key policies and strategies for emissions reduction in the buildings sector

National	Regional	Local
<p>The Future Homes Standard:</p> <ul style="list-style-type: none"> • 2021: c. 31% reduction in regulated CO₂ compared to current standards • 2025: Zero-carbon ready homes <p>Future Buildings Standard: c.27% reduction in regulated CO₂ compared to current standards (tbc)</p> <p>Net Zero Strategy & Heat and Buildings Strategy:</p> <ul style="list-style-type: none"> • Reach 600,000 heat pump installations per annum by 2028 • No new gas boilers sold by 2035 • Upgrade all rented properties to EPC Band C by 2028 and all homes to EPC Band C by 2035 	N/a	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> • Minimum provision of 16,390 homes in the 17-year period 2014 – 2031 • Policy DP39: “minimise energy use” and “use renewable sources of energy” <p>'Mid Sussex Economic Recovery Plan 2020 – 2021'</p> <ul style="list-style-type: none"> • Promote the Green Homes Grants (local authority delivery) <p>'Mid Sussex Sustainability Strategy 2018 – 2023'</p> <ul style="list-style-type: none"> • Install energy efficiency measures for the Oaklands modernisation project

The key challenges and major players are as follows:

Key challenge	Major players
Reducing energy demand in the existing building stock	Owner-occupiers, landlords and (to a lesser extent) building tenants have the greatest ability to influence energy demand. The Government has introduced the Minimum Energy Efficiency Standards (MEES) to encourage uptake of energy efficiency measures in the private rented stock and Local Authorities are responsible for enforcement. National, regional, and local governments can have an impact via energy efficiency advice, loans, and grant funding (where available).
Decarbonising heat and switching away from natural gas and other fossil fuels	BEIS is responsible for setting energy policy at a national level. National, regional, and local governments can play a role by offering financial incentives to switch heating systems such as the Renewable Heat Incentive.
Ensuring that new buildings are compatible with a net zero future	The Department for Levelling Up, Housing & Communities (DLUHC) is responsible for UK Building Regulations on energy and carbon emissions, and Local Authorities are responsible for enforcement. LPAs can currently set higher performance standards, but this may change in the future.
Adopt Circular Economy principles across the entire construction industry	County Councils are responsible for waste management, but in practice there are few levers to achieve this type of fundamental shift in construction practice. LPAs can play a role through planning policy but most of the influence lies with industry bodies, developers, construction companies, manufacturers, and designers.

The areas that MSDC can most influence are as follows:

- The Council will need to rely primarily on engagement and partnerships to reduce emissions in existing housing stock, e.g., continuing to provide energy saving advice. Local Authorities can enforce MEES regulations, although to date very few have done so due to lack of resources, local opposition, and other issues.
- It has more influence over new buildings and major refurbishments via the Local Plan and building control, and direct influence over council-owned properties or developments.
- MSDC can also play a coordinating role in helping to deliver heat networks (e.g., feasibility studies and engaging with stakeholders), and developing a spatial strategy that facilitates the use of waste heat, where available.

3.2.3.2 Transport

What needs to happen to reach net zero?

- All vehicles will need to utilise 100% renewable energy – whether that is renewable electricity, hydrogen, or biofuels. Based on current technologies, electric vehicles (EVs) are likely to be the first choice for cars, vans, and most other vehicles, except for heavy goods vehicles (HGVs), which are more likely to run on biofuels or hydrogen.
- This transition will require a massive increase in the provision of EV charging facilities, along with much more renewable electricity generation. The only way this will be achievable is by radically reducing demand for travel, which includes changes in consumer habits and also switching towards walking, cycling, car clubs/ridesharing, e-scooters (where appropriate) and public transport.

Key policy drivers of emissions in the sector are set out in Table 12.

Table 12. Key policies and strategies for emissions reduction in the transport sector

National	Regional	Local
<p>'The Transport Decarbonisation Plan'</p> <ul style="list-style-type: none"> • Ambition for half of journeys in towns/cities to be walking or cycling by 2030 • Delivery of 4,000 zero emission buses and associated infrastructure • Phase out diesel trains by 2040 and achieve a net zero rail network by 2050 • Increase average road vehicle occupancy • National e-scooter trials • Local Authority toolkit on sustainable transport expected to be released in 2022 • Ban sale of new petrol and diesel cars and vans by 2030, and all new cars and vans to be zero emission at tailpipe by 2035 • Consult on phase-out of internal combustion engine HGVs 	<p>'Electric Vehicle Strategy', West Sussex County Council</p> <ul style="list-style-type: none"> • Increase charging points from 89 to 3,305 by 2025, and 7,346 by 2030 <p>'West Sussex Transport Plan', West Sussex County Council</p> <ul style="list-style-type: none"> • Maintain roads and public rights of way • Encourage sustainable travel • Complete the A272 Haywards Health Relief Road to support delivery of new development 	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> • Create a sustainable transport network <p>'Mid Sussex Sustainability Strategy 2018 – 2023'</p> <ul style="list-style-type: none"> • Burgess Hill Business Parks Promoting good sustainable transport practice <p>'Mid Sussex Economic Recovery Plan 2020 – 2021'</p> <ul style="list-style-type: none"> • Deliver Burgess Hill Place and Connectivity Programme (including upgrades to sustainable transport) • Install 26 new Electric Vehicle Charging Point Operators • Develop a local walking and cycling infrastructure plan

The key challenges and major players are as follows:

Key challenge	Major players
Influencing consumers to choose low emission vehicles	National and local governments can play a role via awareness campaigns, but this is largely down to market forces. Analysis by organisations such as Cambridge Economics, Element Energy and Deloitte indicates that the price of traditional fuel vehicles and EVs will converge in the next few years. Uptake could be accelerated through local business owners which incorporate ULEVs into their own fleet.
Behaviour change and travel habits	As above, the role of local government may involve awareness campaigns, but they can also have an influence by delivering towns and places that facilitate sustainable travel (see below).
Design of towns, cities and roads to facilitate sustainable travel	Urban planning is within MSDC's remit as an LPA, while responsibility for the road network lies primarily with National Highways. The DfT plays a strategic role in setting transport policy nationally while Local Transport Plans are produced by West Sussex County Council.
Providing renewable electricity and other supporting infrastructure	West Sussex County Council is responsible for the roll-out of EV infrastructure locally.

The areas that MSDC can most influence are as follows:

- MSDC will need to rely on showcasing, partnerships, and engagement to successfully encourage uptake of private EVs. This will include working with the County Council and National Highways to make sure that the road network prioritises pedestrians, cyclists, and public transport. The Council could incentivise uptake through parking charges.
- Ensure that all new developments are located and designed to reduce demand for travel and encourage active/sustainable transport options. This could involve, for example, setting maximum rather than minimum parking standards, and identifying sites for consolidation centres to reduce the number of commercial goods vehicles operating in town centres. (This would have co-benefits for air quality, public health, etc.)
- For assets directly controlled by MSDC, introduce EV charging (co-located with renewable power generation and battery storage) and make sure the vehicle fleet is 100% low emission.

3.2.3.3 *Energy and utilities*

What needs to happen to reach net zero?

- A fundamental transformation of the UK energy system is needed to phase out fossil fuels by 2050 at the latest. In the Energy White Paper (2020) the Government envisions that electricity use could double by then, meaning that the deployment of renewable technologies – along with battery storage and improvements to grid infrastructure – will need to scale up at an unprecedented rate.
- The Government has announced an ambition to deliver 40GW of offshore wind power by 2030, potentially enough to power all homes in the UK. However, to ensure security of supply, it will be important to work towards a diverse system that includes large- and small-scale solar, wind, tidal power, hydropower, and bioenergy, among other technologies. This will require a shift in thinking such that there is a presumption in favour of renewable energy projects.

Key policy drivers of emissions in the sector are set out in Table 13.

Table 13. Key policies and strategies for emissions reduction from energy and utilities

National	Regional	Local
<p>'Net Zero Strategy: Build Back Better' HM Government (2021)</p> <ul style="list-style-type: none"> Fully decarbonise the power system by 2035 Increase offshore wind from 10GW (2019 levels) to 40GW by 2030 Support renewables with nuclear power including small modular reactors 	<p>'West Sussex Energy Strategy Action Plan', West Sussex County Council</p> <ul style="list-style-type: none"> Reduce energy consumption Develop the commercial provision of low carbon energy Develop new financial provision of low carbon energy <p>UKPM Green Action Plan</p> <p>South2East Local Energy Strategy</p>	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> Policy DP40: "Proposals for new renewable and low carbon energy projects [...] will be permitted provided that any adverse local impacts can be made acceptable" Wind energy developments not permitted unless they are on allocated sites

The key challenges and major players are as follows:

Key challenge	Major players
Reducing costs and financial barriers to enable further uptake	At a national level, Ofgem regulates gas and electricity markets and funds certain types of energy infrastructure projects. It also manages financial incentive schemes such as the Renewables Obligation, Renewable Heat Incentive, and the Smart Export Guarantee. BEIS provides funding for emissions reduction projects (SALIX), heat network feasibility studies (via the Heat Network Deployment Unit), and other research.
Upgrading existing grid infrastructure	National Grid is in charge of transmission of both electricity and gas. The distribution network operator (DNO) for electricity in Mid Sussex and surrounding areas is UKPN, while the DNO for gas is Scotia.
Identifying and allocating areas for large-scale renewable energy projects	MSDC plays a role by identifying suitable areas for renewable energy projects within the district and setting planning requirements. Other key players include community energy groups, along with organisations and businesses that deliver renewable energy projects. Historically there has been community opposition to some technologies (particularly wind) so the general public is also a key stakeholder in this regard.

The areas that MSDC can most influence are as follows:

- MSDC has relatively limited influence over the decarbonisation of the national grid, but can play an indirect role through engagement, partnerships and in its capacity as an LPA. For example:
 - Demonstrating and showcasing the feasibility and benefits of projects, particularly small-scale renewable energy and battery power projects on council-owned land or properties, or innovative pilot projects
 - Playing a coordinating role (e.g., through Solar Together Sussex or community energy projects)
- In terms of infrastructure provision and large-scale renewables, the Council will need to work with UKPN, energy companies and landowners to identify suitable locations and support infrastructure improvements. It can facilitate this via permissive Local Plan policies.
- Providing funding where possible and lobbying the Government for additional support.

- There are limited opportunities for MSDC to influence the use of some technologies such as hydrogen gas and carbon capture usage and storage, initiatives which will be driven predominantly at the national level.

3.2.3.4 Waste

What needs to happen to reach net zero?

- At present there are no technologies that entirely mitigate the GHG effects of methane, a gas that is emitted by landfill and sewage treatment. Waste is therefore a sector that may need to rely on negative emissions technologies to reach net zero by 2050 – technologies that are not yet commercialised. Therefore, to avoid these emissions, it will be necessary to radically reduce food waste, stop sending biodegradable waste to landfill in the 2025-2030 timescale, and separate all remaining waste to enable much higher recycling rates of c. 70%, according to the CCC.
- Some waste products can be used to provide bioenergy, thus displacing fossil fuels. Energy recovery with carbon capture and storage will need to be deployed to any waste incineration facilities (EfW) to make sure that all available resources are used.

Key policy drivers of emissions in the sector are set out in Table 14.

Table 14. Key policies and strategies for emissions reduction from waste

National	Regional	Local
<p>'Resources and Waste Strategy for England'</p> <ul style="list-style-type: none"> • Ambition for 55% recycling rate by 2025, rising to 65% by 2035, from the 2018/2019 level of 47%. • Aim for “eliminating avoidable waste of all kinds by 2050.” • Strategy hopes to achieve this by measures such as: requiring LAs to collect a consistent set of recyclables and food waste, introducing mechanisms to ensure that the ‘polluter pays’ for the cost of collecting and processing waste that they place on the market, introduction of deposit return schemes, etc. 	<p>'West Sussex Local Waste Plan', West Sussex County Council</p> <ul style="list-style-type: none"> • “The strategy is to plan for a declining amount of capacity over the plan period so that there is so that there is ‘zero waste to landfill’ by 2031” 	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> • Policy DP39: “Maximise efficient use of resources, including minimising waste and maximising recycling/re-use of materials through both construction and occupation”

The key challenges and major players are as follows:

Key challenge	Major players
<p>Changing behaviour to reduce the amount of waste generated</p>	<p>DEFRA is responsible for policy and regulations on waste, while the EA plays a role in issuing permits for waste disposal and treatment and dealing with waste crime and pollution. District Councils are responsible for household waste collection and some commercial waste collection while County Councils are responsible for waste disposal; MSDC has contracted Serco to deliver waste management services. Collectively they can influence recycling rates and biodegradable waste at different stages of the</p>
<p>Increasing recycling rates and diverting</p>	

biodegradable waste from landfill	supply chain, and deliver awareness campaigns to change people’s behaviour, although ultimately this relies on cooperation from consumers and businesses.
Deployment of energy recovery with carbon capture and storage (CCS)	The Government is leading on CCS technologies nationally, but District and County Councils may have a role linked to their responsibilities for waste management, environmental services, planning powers and community consultation. However, this will also rely on technological improvements and industrial R&D.

The areas that MSDC can most influence are as follows:

- The main options are:
 - Engagement with residents, businesses, the County Council, waste contractors and Government to promote waste reduction measures
 - Considering options for future carbon emissions reduction when renewing waste contracts
 - Continuing to provide separate collections for different waste streams, including food and green waste
 - Showcasing best practice by setting targets for reducing waste within operations that MSDC directly controls. The CCC suggests that Local Authorities ‘introduce a zero-waste procurement policy that bans single-use plastics, excess packaging, specifies recycled content, favours appliances and goods that can be repairable and recyclable.’
- Where appropriate, supporting organisations applying to generate energy from waste e.g., anaerobic digestion facilities – provided that waste minimisation plans are in place – and keeping abreast of developments in EfW CCS.

3.2.3.5 Land use and environment

What needs to happen to reach net zero?

- According to the CCC some reduction in GHG emissions can be achieved through diet change and by adopting low carbon farming practices e.g., better soil and livestock management, less use of fertilisers, and increased diversification. However, the CCC also states that a net zero future will require a large increase in natural carbon sequestration through afforestation, peatland restoration, and similar projects. This can only be achieved if large areas of agricultural land are released for alternative uses – which, in turn, would rely on shifts in consumer behaviours and diets, reducing food waste, and new farming technologies to maintain per capita food production.
- Land use policies will therefore need to recognise the value of natural capital and reward activities that deliver environmental benefits.

Key policy drivers of emissions in the sector are set out in Table 15.

Table 15. Key policies and strategies for emissions reduction in the land use sector

National	Regional	Local
‘The Environment Act’ ‘The 25 Year Environment Plan’ • Embed environmental net gain as a principle for development (including	‘Climate Change Adaptation Plan and Strategy’, South Downs Park Authority • “We need to balance the push for increase tree planting with the need to	‘Mid Sussex District Plan 2014 – 2031’ • Policy DP37: “The District Council will support the protection and enhancement of trees,

<p>housing and infrastructure)</p> <ul style="list-style-type: none"> • Improve soil health and expand tree cover • Green towns and urban areas <p>'The England Trees Action Plan 2021-2024'</p> <ul style="list-style-type: none"> • 12% woodland cover by mid-century <p>Note, the CCC and Woodland Trust both recommend 19% tree cover Agriculture Bill (2020)</p>	<p>protect other priority habitats and avoid unintended consequences"</p> <ul style="list-style-type: none"> • The South Downs Local Plan requires a 10% gain in biodiversity as a planning condition, which "could support actions such as tree planting, carbon sequestration and work on climate change resilience" 	<p>woodland and hedgerows, and encourage new planting."</p> <p>'Tree Management Policy', Mid Sussex District Council</p> <ul style="list-style-type: none"> • "The Council wishes to maintain and increase high level of tree cover across the District."
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The key challenges and major players are as follows:

Key challenge	Major players
<p>Protecting existing carbon sinks, while also protecting ecosystems, natural habitats, and biodiversity</p>	<p>DEFRA is responsible for Government policy on a range of environmental topics including but not limited to land management, conservation, biodiversity, and climate adaptation. Natural England is responsible for designating and managing certain nature reserves, parks, and other areas of the countryside. The Environment Agency (EA) is responsible for protecting the environment which includes regulating environmental pollution. Other stakeholders are the South Downs National Park Authority and the High Weald Joint Advisory Committee.</p>
<p>Low carbon agricultural practices (livestock and land management)</p>	<p>Policy, regulations, and enforcement are primarily the responsibility of DEFRA and the EA, but the decision to exceed minimum standards and adopt low carbon practices would largely fall to landowners. Farming tenants are key stakeholders but have less influence over land use.</p>
<p>Increasing tree cover and ensuring it is sustainably managed in the long term</p>	<p>Policy is set at a national level by DEFRA, although MSDC can contribute indirectly via its role as an LPA.</p>
<p>Releasing agricultural land for alternative uses e.g., woodland or rewilding projects</p>	<p>As above, the spatial strategy for the district can have an impact; however, the major players include consumers (whose dietary and lifestyle habits influence production), private landowners, businesses, industry bodies, communities, and researchers/innovators in the field of agricultural production.</p>

The areas that MSDC can most influence are as follows:

- Engage with local businesses, industry groups, conservation groups, the High Weald AONB and South Downs Park Authorities to raise awareness of sustainable land use and showcase best practice on land that it owns.
- Provide business support to landowners and farmers to enable them to adopt low carbon practices, and support research initiatives or pilot projects on these topics as appropriate.
- There is scope for MSDC to partner with other local governments or organisations to deliver projects within (or outside of) the district such as woodland creation.
- Promote tree cover and other green infrastructure via the Local Plan and spatial strategy, although in practice this would primarily impact new developments. Note that biodiversity should be given equal importance to carbon emissions and energy use in planning policy, although that is not the focus of this report.

3.3 NET ZERO PATHWAYS

This section of the report describes potential future GHG emissions trajectories for Mid Sussex, based on three different scenarios that consider various possible mitigation measures, levels of ambition, and implementation rates. These findings indicate the scale and direction of possible changes over time, which helps to identify and prioritise GHG mitigation actions.

Key messages

- A **'Business as Usual' (BAU) scenario has been modelled** to show the potential scale of emissions reduction that would be achieved if no additional mitigation measures are adopted beyond those that are already likely to occur. This takes the BEIS Energy and Emissions Projections as a starting point and tailors them to reflect local circumstances where needed. The BEIS projections account for future economic, population and technological trends, along with adopted and funded Government policies and initiatives. Relative to the 2019 baseline, **the BAU scenario would result in a roughly 17% decrease in emissions by 2030 and 33% decrease by 2050**. This leaves a significant shortfall against the target that would need to be addressed through other means.
- **Two additional pathways have been modelled** using Ricardo's Net Zero Projections (NZP) tool. These scenarios **explore the impact of additional behavioural and technological measures aimed at mitigating energy use and GHG emissions**. They represent different levels of ambition, and contribute towards an understanding of key risks, sensitivities, and opportunities for Mid Sussex.
- **Around 90% of emissions can be addressed using known technologies if supplied with 100% renewable electricity (which can come from the grid in theory)**. However, there are no silver bullets. It is important to deliver demand reduction measures as well for a wide variety of reasons, including minimising pressure on grid infrastructure, reducing impacts of energy price rises, and avoiding unsustainable pressure on other resources such as land, materials, and water.
- **Of the remaining emissions, around half are from the industrial sector**. These would likely rely on technological changes such as availability of green hydrogen or bioenergy with carbon capture and storage (BECCS), which is a risk – although in theory could be feasible by 2040. MSDC can take local actions to support the development of those technologies by providing renewables and bioenergy crops where appropriate.
- **The remaining emissions are mostly from the waste and agricultural sectors**. These are, in some ways, the most challenging to address as they rely not only on technological advancement, but also wider changes in consumer behaviour, waste and land management, and so on.
- The path to net zero is challenging, and all of the potential solutions involve risks and trade-offs to consider. **However, compared with some UK Local Authorities, there are more opportunities in Mid Sussex to achieve carbon reduction measures**. This is a positive message, and a useful starting point for developing a net zero roadmap.

3.3.1 Overview of the methodology

3.3.1.1 Modelling approach

Future GHG pathways were modelled using the Ricardo Net Zero Projections (NZZ) tool, which enables users to model the impact of implementing mitigation measures on a Local Authority's GHG emissions over time. It is a flexible tool that can be quickly configured to model the change in energy use and GHGs emissions (including non-energy related emissions) by specifying the breakdown structure of the energy and non-energy related emissions that aligns with the area's base year datasets and reporting requirements, and factoring in changes in demand (e.g., due to growth) and emission factors over time.

The tool is designed to enable the development of scenarios for reaching net zero by any given target year and allows the users to define mitigation measures for each line in the energy and emissions inventory. These scenarios can be used to build a baseline projection, assess the likely impact of planned measures, and model the impact of alternative strategies to reaching net zero. The scenarios can also be used to undertake sensitivity testing around the impact of changes in assumptions.

The tool is essentially a 'What if?' calculator tool that relies on external validation of inputs, assumptions, and outputs to ensure its projections are sensible. At its core the tool is an accounting system that calculates the change in energy use and fuel mix as a result of series of mitigation measures.

It is important to understand that this modelling is based on assumptions about the magnitude of energy or emissions reduction that is technically achievable within each sector. However, it makes no assumptions about the types of policies that would be needed to achieve this. To give an example, the NZZ tool can estimate the change in emissions that would result from a 10% reduction in miles travelled by private car, but it cannot assess the impact of specific policy measures, such as 'Introduce a workplace parking levy to discourage people from commuting in private cars' unless the user inputs an assumption about the quantitative impact this would have. That type of information must be established via separate modelling, research, case study evidence or expert judgment.

3.3.1.2 What pathways were explored and how were they developed?

This work has explored three future pathways for GHG emissions in Mid Sussex: A 'Business as Usual' (BAU) scenario, and two additional net zero pathways.



The BAU scenario is intended to show the changes that could occur if no additional local action was taken to mitigate GHG emissions in Mid Sussex, beyond those that are already planned and committed.

This primarily includes national-level economic and demographic trends, along with projected energy prices and likely technological improvements (e.g., better vehicle efficiency). Those assumptions are based on the BEIS Energy and Emissions Projections (EEP), which also considers the anticipated GHG reductions that are expected to occur due to adopted Government policies '*where funding has been agreed and where decisions on policy design are sufficiently advanced to allow robust estimates of policy impacts to be made*'.²⁸ Taking Mid Sussex' baseline emissions as a starting point, growth curves based on the EEP data were then applied to each sub-sector and fuel type in Mid Sussex. This means that the overall change in emissions reflects the baseline situation in the d.

A sense-checking exercise was carried out to assess whether it was appropriate to apply these national trends at a local level – for example, by cross-checking national population growth projections with those for Mid Sussex (see Figure 57). Adjustments were then made to reflect local factors. The main exception is for the domestic sector, where we have applied a 2031 cut-off rate for growth on the understanding that there is not an annual housing target beyond that point, and it is unclear what the patterns of development would be.

²⁸ For further information, see [Energy and emissions projections - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/energy-emissions-projections-2022.pdf)



In addition to the BAU scenario, this work has explored two accelerated net zero pathways, which explore the impact of a range of behavioural and technological measures aimed at further mitigating energy use and GHG emissions.

The first net zero pathway considers changes that would need to occur in order to meet the nationwide 2050 target date. The mitigation measures in the 2050 scenario are broadly in line with the CCC’s ‘Balanced’ net zero pathway, which the CCC describes as follows: “The Balanced Pathway makes moderate assumptions on behavioural change and innovation and takes actions in the coming decade to develop multiple options for later roll-out (e.g., use of hydrogen and/or electrification for heavy goods vehicles and buildings).”²⁹

The second net zero pathway sets out an alternative, accelerated scenario which reaches net zero by 2040. The key driver for this scenario is the assumption that the Government meets its stated ambition of achieving a net zero electricity grid by 2035. If that were to occur, faster decarbonisation could potentially be achieved by prioritising electrification, particularly for buildings and transport.

The net zero pathways both include the same core assumptions about population, weather, fuel prices and economic trends as are used in the BAU scenario, which is used as the starting point for the analysis. All of the other changes are modelled as mitigation measures that would need to be adopted, whether via additional Government policies, local/regional initiatives, or through voluntary changes in consumer behaviour, business and industrial practices. The table below summarises the mitigation measures that are modelled in each scenario; further details are provided in Appendix C.

Category	Mitigation measures considered
Energy use in buildings	<ul style="list-style-type: none"> Reducing heat and electricity demand due to fabric energy efficiency, smart heating controls, uptake of LED lighting and upgrades to non-domestic heating, ventilation, and air conditioning (HVAC) systems. Connecting some buildings to heat networks, and then converting these to use renewable heat (e.g., electric heat pumps). Buildings that do not connect to heat networks are assumed to switch to electric heating, heat pumps or hydrogen gas to provide space heating and hot water.
Industrial energy use	<ul style="list-style-type: none"> Switching any remaining fossil fuel demands to electricity, hydrogen, or another zero-carbon fuel source such as bioenergy with carbon capture and storage (BECCS).
Road transport	<ul style="list-style-type: none"> Avoiding car journeys via behavioural and technological changes, e.g., working from home Replacing a proportion of remaining car journeys with walking, cycling, and public transport Reducing demand for LGV and HGV movements through trip consolidation and changes in logistics Improving HGV efficiency through technology improvements and driver training initiatives Uptake of electric vehicles (cars, vans, buses, and motorcycles) Uptake of hydrogen (buses and HGVs)
Other transport	<ul style="list-style-type: none"> Electrification of rail network
Energy system	<ul style="list-style-type: none"> Electricity grid decarbonisation taking place in line with national projections (in the 2050 scenario) or reaching net zero by 2035 (in the 2040 scenario)

²⁹ [The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf \(theccc.org.uk\)](#)

	<ul style="list-style-type: none"> • Massive increase in deployment of roof-mounted solar technologies on suitable buildings
Agriculture	<ul style="list-style-type: none"> • Reducing the consumption of meat and dairy and thereby reducing the number of livestock • Halving food waste across the supply chain by 2030 • Implementing measures to release land, such as productivity improvements • Employing low carbon farming practices in soil, livestock, and manure management • Replacing fossil fuels in agricultural machinery with biofuels and electricity
Waste	<ul style="list-style-type: none"> • Preventing waste, increasing recycling rates, and implementing landfill bans • Employing landfill methane capture technologies and utilising CCS at energy-from-waste (EfW) plants
Miscellaneous	<ul style="list-style-type: none"> • Increase in carbon sequestration via tree planting within the district and potential land use change to woodland has been discussed with MSDC but at present there is insufficient information to model interventions.

These pathways are intended to highlight the scale and direction of changes that could occur if the above measures were implemented. They are not intended as a projection or forecast of future energy use and emissions. It is also worth noting that, in reality, implementing these types of changes would almost certainly lead to dynamic impacts across different activities and sectors, thus affecting wider trends such as fuel prices. Those interactions are highly complex and have not been quantified in this study. Nonetheless, these scenarios provide a useful way to assess and prioritise potential interventions – and understand MSDC’s level of influence when it comes to achieving net zero emissions.

3.3.2 The Business-as-Usual scenario

3.3.2.1 Assumptions about future changes

The EEP data incorporates a range of information, including projections for:

- Annual growth rates for population and number of households
- Annual growth rates for economic parameters:
 - Real UK GDP
 - GDP Deflator
 - Real household disposable income
 - Industrial production
- Weather changes (winter degree days)
- Retail and wholesale energy prices, carbon prices, and exchange rates

For more information, refer to the BEIS EEP Methodology Report.

The Office of National Statistics (ONS) projections indicate that the population of Mid Sussex, which was 149,716 in 2018, could reach around 159,823 by 2030 (a 6.8% increase) and 165,394 by 2040 (a 10.5% increase). These growth rates are somewhat larger than the ONS forecasts for England as a whole (which would see population increases of 5.7% and 9.3% by 2030 and 2040, respectively), but still align closely as shown in the chart below.

Figure 57. Population growth projections for Mid Sussex and England, 2018-2043. Source: ONS

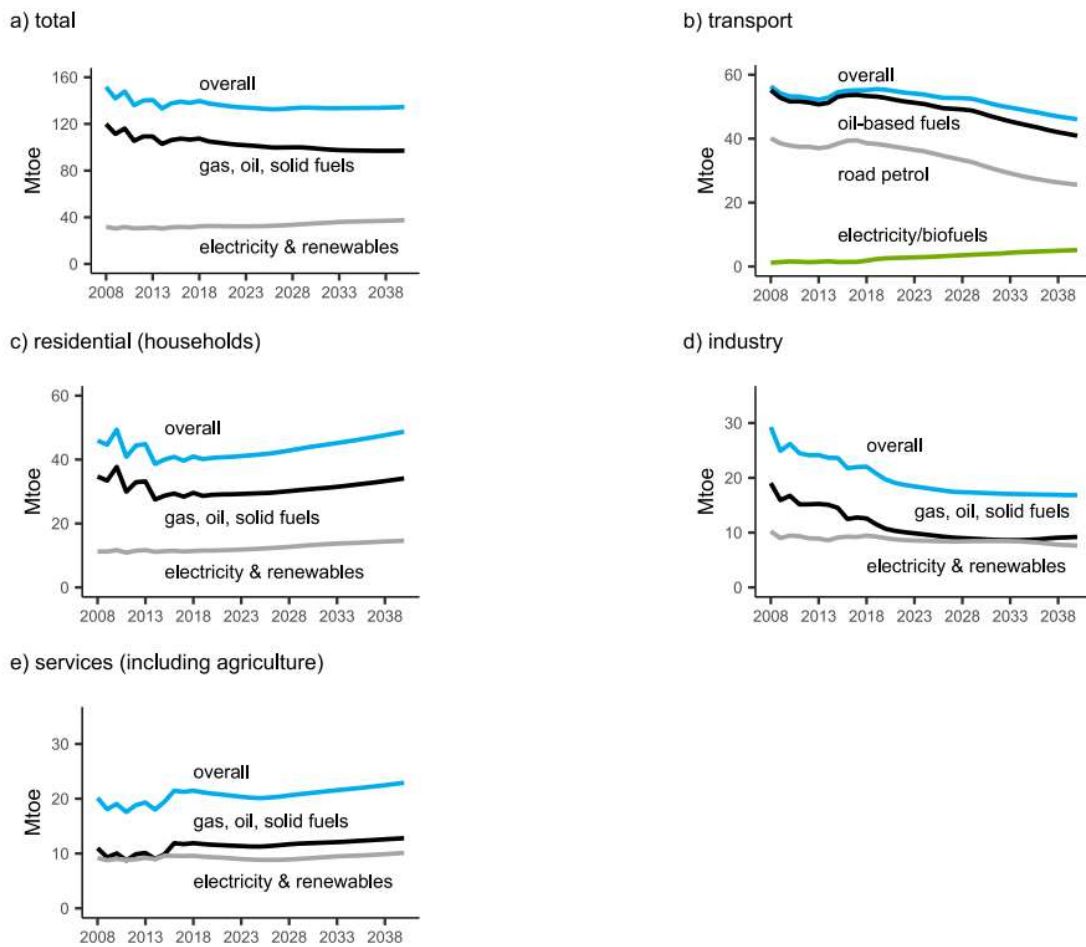


Note, the EEP data was developed prior to the publication of the Government’s Net Zero Strategy on 19th October 2021 and, as such, does not account for any of the policy proposals set out in that report. It also does not account for several policy proposals that were announced previously where there was insufficient detail available at the time to support an assessment, of which notable examples include:

- The proposed 2030 ban on the sale of new petrol and diesel vans and cars; and
- Future changes to UK Building Regulations for new developments

The charts below, which are extracted from the EEP Methodology Report, shows the future changes in fuel consumption that form the basis of the emissions projections. Broadly speaking, emissions from transport (primarily road transport) are expected to decline, emissions from the residential sector would tend to increase, and emissions from other non-residential sectors (including commercial, industrial and public sector buildings and facilities) exhibit an initial decline before tending to level out in the 2030s. Total fuel consumption would be slightly lower than it is at present, but this would lead to a proportionally larger change in GHG emissions which is primarily due to the effects of electricity grid decarbonisation.

Figure 58. Final energy demand by fuel and consumer sector. Source: BEIS



In the transport sector, there is a general shift towards the use of electric vehicles, and because these are more efficient than combustion engines, this leads to an even larger proportional reduction in the use of petroleum products. Demand for petroleum products will also tend to decrease, which is attributed to the introduction of more stringent emissions standards for cars, vans, and HGVs.

Nationally, according to the EEP, the domestic sector would see a larger increase in both fuel use and emissions, driven by changes in population, income levels, weather, and fuel prices. Note that our BAU pathway has reduced this growth rate by roughly 50% to account for the introduction of the Future Homes Standards, as well as the fact that a significant proportion of new homes would be delivered outside of the area boundary.

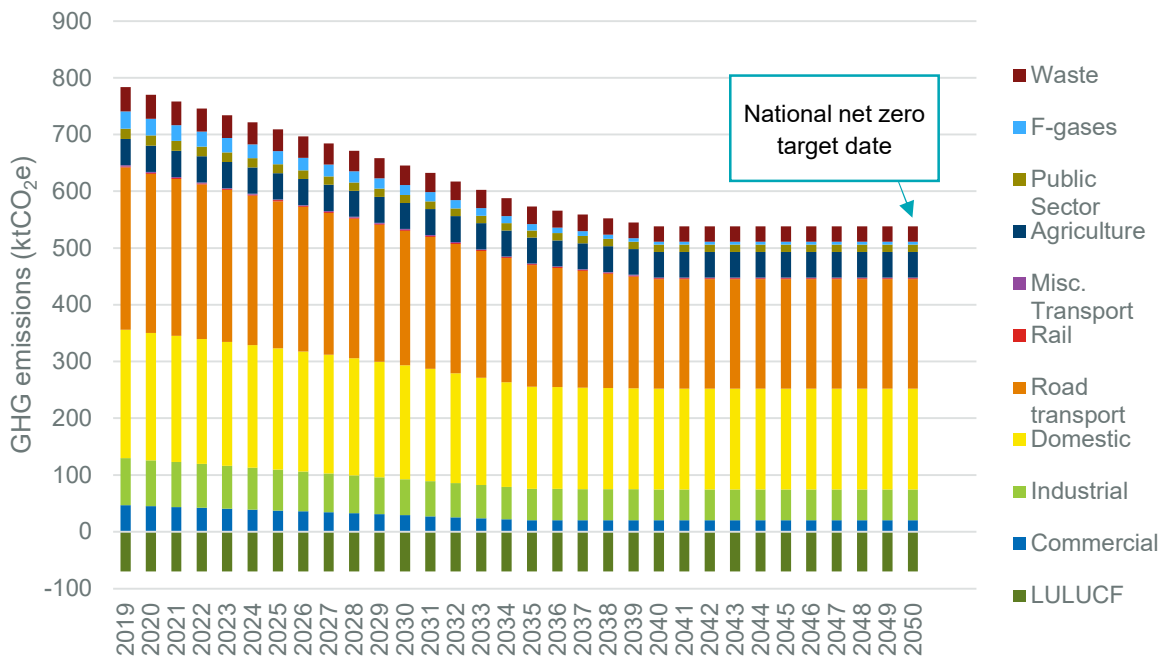
In the industrial sector, demand for electricity and renewables would rise slightly, while demand for gas, oil and solid fuels would remain roughly the same. In other non-industrial sectors (referred to as 'Services' in the chart above), demand for all fuels would increase slightly. For these sectors, economic growth, weather, energy prices and changes in industrial production are key drivers.³⁰

3.3.2.2 Impact on GHG emissions

In the BAU scenario, GHG emissions in Mid Sussex would fall by 17% by 2030, 33% by 2040, and 34% by 2050. As illustrated in Figure 59, most of the emissions reduction is projected to occur by 2040 after which it mostly stagnates without the implementation of additional measures.

³⁰ For more information, see [Energy and emissions projections: methodology overview \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/90212/energy-emissions-projections-methodology-overview.pdf)

Figure 59. Changes in GHG emissions by sector in the BAU scenario



Although some of this change is attributed to falling energy consumption, the other major factor is decarbonisation of the electricity grid, which is assumed to fall from 0.2107 kgCO₂e/kWh in 2019 to approximately 0.0888 kgCO₂e/kWh in 2030 and 0.0048 kgCO₂e/kWh in 2050. This can clearly be seen when comparing Figure 60 and Figure 61, which look at energy use and GHG emissions by fuel type. The change in emissions from grid electricity is disproportionately large compared with the change in electricity consumption.

Figure 60. Energy use by fuel type in the BAU scenario

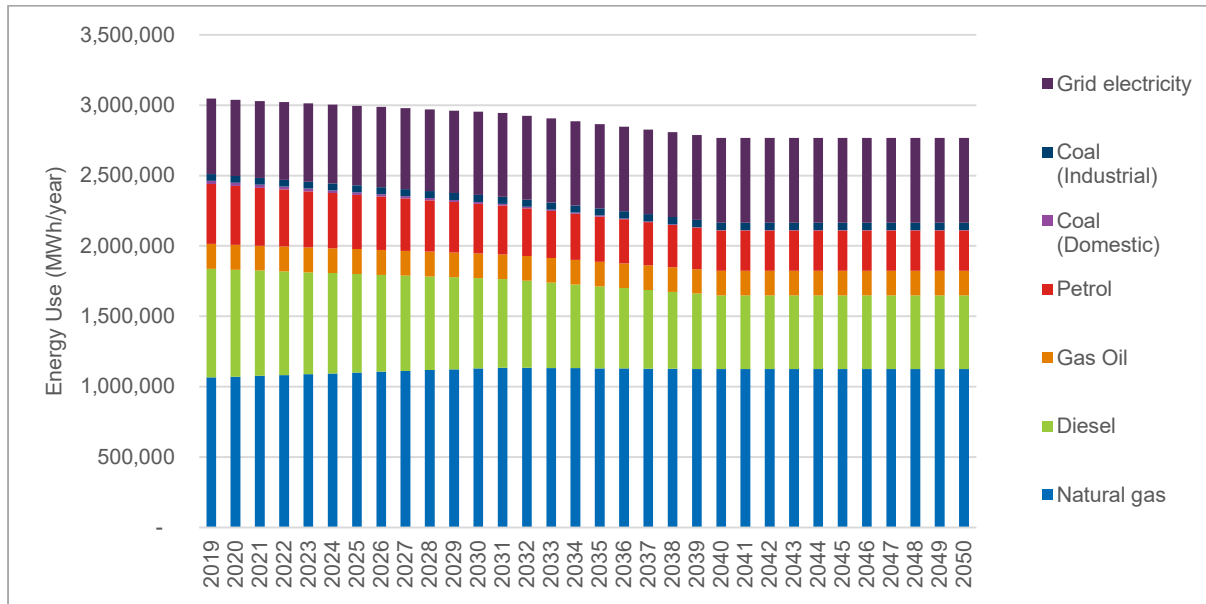
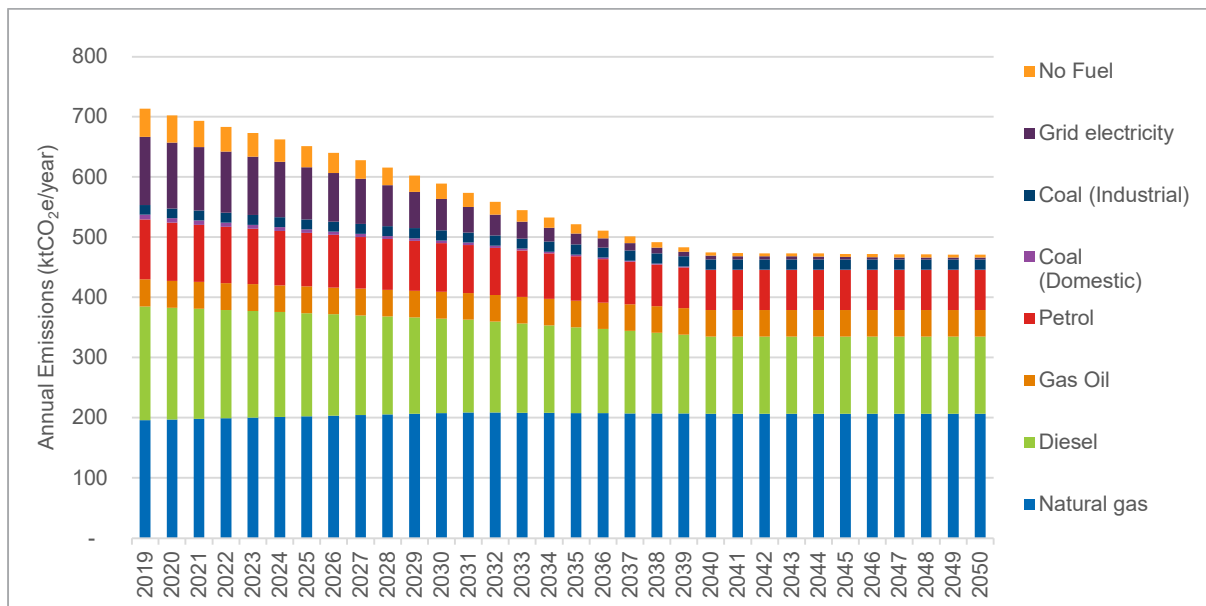


Figure 61. Emissions by fuel type in the BAU scenario



The cumulative energy-related emissions between 2020 and 2050 would be approximately 16,474 ktCO₂e. This means that the Paris-aligned carbon budget for the period through the year 2100 would be used up by 2028 if no additional mitigation action is taken.

Mid Sussex currently does not have a carbon neutrality target but aims to align their emissions reduction pathway with the Government’s overarching commitment of reaching net zero by 2050. As the BAU scenario shows (see Figure 59), the vast majority of emission reductions on the current trajectory will likely occur before 2040 – especially if the power decarbonisation target of 2035 is achieved. This means that with a target between 2035 and 2050, MSDC could maximise on the national grid decarbonisation which drives the majority of the emissions reduction in the BAU scenario and which many mitigation actions will depend on.

With this as a starting point, reaching net zero in Mid Sussex in line with or ahead of the national 2050 target date will broadly require:



Reducing demand for energy and other resources as much as possible via energy efficiency, behavioural change, and technological means



Switching all (or nearly all) fuel consumption to electricity instead of fossil fuels, including energy use in buildings and transport



Radically decarbonising the electricity supply by increasing deployment of renewable power, phasing out fossil fuels, and delivering associated infrastructure upgrades



For sectors or activities that cannot use electricity, mitigating emissions by using other renewable or low-carbon energy sources and making use of carbon capture and storage



Changing agricultural practices and land uses to increase carbon sequestration and reduce emissions of other GHGs



Offsetting residual emissions by delivering further GHG reductions outside the boundary of Mid Sussex – as a last resort

3.3.2.3 Uncertainties, risks, and opportunities

This section describes some of the uncertainties, risks, and opportunities highlighted by the BAU analysis. This is not a comprehensive list but summarises some of the main points.

Uncertainties in the BAU scenario	
What are they?	What are the implications?
There are inherently high levels of uncertainty in any form of GHG or energy scenario modelling. Unforeseen events can have a major impact. The COVID pandemic is a good example, but others could include economic changes, major political events, extreme weather, etc.	It is important to acknowledge that the pathways are not forecasts. They are instead intended to highlight the scale and direction of changes that may occur, to help inform the development of local mitigation measures.
The Government has recently announced a range of policies and other ambitions as part of a nationwide net zero strategy that are not currently accounted for.	Many of the measures announced by the Government are modelled as additional mitigation measures in the subsequent sections of this report, so their effects are at least partially quantified. However, responsibility for achieving or implementing those measures may shift away from local stakeholders to the central Government.
Changes in fuel consumption in the commercial and industrial sectors will be more dependent on the specific types of industries and activities taking place in Mid Sussex. As discussed in the Baseline chapter, there is less information available on this topic than, for example, on domestic and road transport energy use.	The lack of information makes it harder to comment on the likelihood that local trends would align with the national trends in this regard. Findings relevant to the industrial and commercial sectors should therefore be treated with some additional caution.
The rate of national electricity grid decarbonisation in the model is based on Government figures but the speed of decarbonisation has been generally viewed as optimistic. On the other hand, this may now	At the time of writing (November 2021) it is too early to comment on the potential rate of future grid decarbonisation. As will be discussed throughout this report, this is a key issue

change in light of recent announcements on achieving a net zero electricity grid by 2035.	because it is one of the major sensitivities in the model.
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Risks to achieving net zero	
<p>What are they?</p> <p>The BAU scenario shows a very large gap to reaching net zero, which means there will be huge pressure to deliver additional mitigation measures locally or regionally.</p> <p>If national grid decarbonisation is slower than assumed, the reduction in GHG emissions would be even lower than shown.</p> <p>Weather extremes, which are expected to be more likely due to climate change, could result in both short- and long-term changes in energy use. Heatwaves are an example as they could prompt more people to install artificial cooling systems.</p>	<p>What are the implications?</p> <p>MSDC will need to collaborate with a range of stakeholders and utilise all available policy levers / areas of influence. This includes lobbying the Government for additional support.</p> <p>This is a particular challenge because there are very few ways that MSDC or local stakeholders can have an influence. MSDC should aim to maximise local renewable generation, which will help to provide zero carbon electricity locally, and facilitate this broader shift by supporting larger-scale renewables where possible.</p> <p>MSDC should consider developing strategies for considering climate mitigation and adaptation needs alongside. These will differ between the more rural and urban settings of the district. While this is a crucial consideration for Mid Sussex, detailed information on climate adaptation is outside the scope of this report.</p>

Opportunities	
<p>What are they?</p> <p>Changes in emissions in the domestic sector will depend in large part on consumer behaviour, income levels, and so on. However, the increase will also depend on the level of new housing that is delivered within the district and the energy and CO₂ performance standards that those buildings are required to meet.</p> <p>MSDC has full influence over its own assets and can therefore set an earlier net zero target for the Council compared to the entire district. Additionally, the overall net zero pathway can be supported by ambitions in the private sector and other public sector entities such as the County Council and the NHS which has a net zero target of 2045 as well as incremental reduction targets for 2036 and 2039.</p> <p>It is likely that the BAU scenario shown above underestimates the potential changes in emissions from road transportation if EV uptake happens more rapidly. This would be the case if the proposed 2030 ban on new petrol and diesel cars and vans comes into place as well as the recent proposition (21st of November 2021) of making EV charging points mandatory in new homes and buildings. Moreover, it is anticipated that the price of electric vehicles will reach parity with combustion engine vehicles in the next few years, which could have a major impact on consumer choices even without additional policy incentives.</p>	<p>What are the implications?</p> <p>MSDC can influence the design of new developments and major refurbishment projects in its role as a Local Planning Authority. This could mean limiting emissions from new developments while promoting uptake of local renewable energy technologies and enshrining this into local policies.</p> <p>Although the public sector does not contribute very much to total GHG emissions, if there are any specific commitments then these could be incorporated into the BAU scenario. In practical terms this would mean that the Roadmap could focus more on defining interventions in other sectors.</p> <p>In this instance, MSDC would not need to do as much to promote local uptake of EVs and would play more of a facilitation role by helping to provide adequate charging infrastructure. The focus would also shift towards promoting active travel modes and use of public transport.</p>

The rural nature of Mid Sussex offers considerable opportunities for carbon sequestration. This should be done with consideration of the ecological emergency and climate adaptation needs such as natural flood protections.

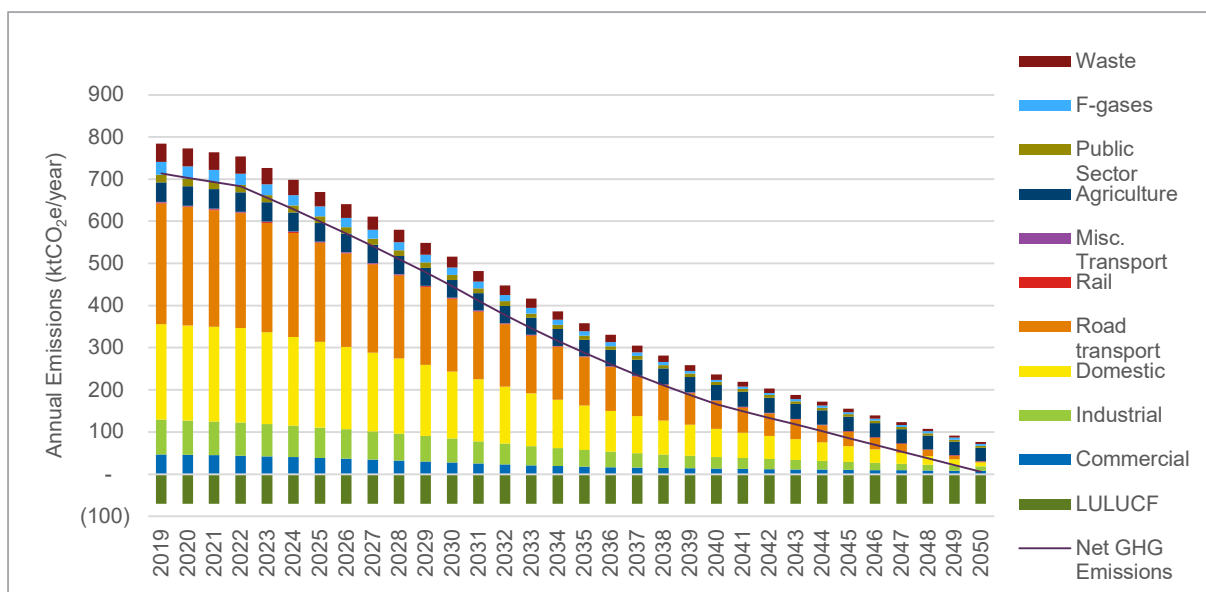
MSDC can reduce their emissions through carbon sequestration projects in existing woodlands or through afforestation projects. This will need to be done in cooperation with stakeholders who manage crucial biodiversity habitats in Mid Sussex such as the High Weald AONB or the South Downs National Park.

3.3.3 2050 net zero pathway

The BAU results clearly show that further actions will be required. This section considers the results from an ambitious pathway that aims to reach net zero by 2050. As stated previously, a key reference point for determining the type and scale of intervention measures for this scenario is the CCC’s ‘Balanced Pathway’ for UK-wide emissions. As with the BAU scenario, information specific to Mid Sussex has also been used wherever possible, with an example being the Sustainable Energy Study from 2014 which has been used to inform estimates of future renewable energy capacity.³¹

Taken together, the mitigation measures modelled in this scenario result in an emissions reduction of 38% by 2030, 77% by 2040, and 99% by 2050 compared to the 2019 baseline with residual annual emissions of 6 ktCO₂e in 2050. As illustrated in Figure 62 below, varying levels of reduction are seen across different sectors. The most dramatic changes occur in sectors where there is a complete (or near-complete) shift to the use of electricity instead of fossil fuels.

Figure 62. Emissions by sector in 2050 scenario



Considering future emissions in Mid Sussex now by sector, the largest reductions are seen in the transport and domestic sectors, which decrease by 99% and 96% respectively by 2050. The smallest reductions can be seen for agriculture and rail with 33% and 37% respectively. The agriculture sector is particularly difficult to decarbonise as it is dominated by non-CO₂ emissions from livestock and crop production (e.g., use of fertiliser), which are hard to eliminate given the inherent biological and chemical processes involved.³² The LULUCF sector currently shows no change as increases to carbon sequestration were not modelled.

³¹ [Mid Sussex Sustainable Energy Study Report](#)

³² [The-Sixth-Carbon-Budget-Methodology-Report.pdf \(theccc.org.uk\)](#)

The effect of switching to a zero-carbon energy source will, to some extent, mask the impacts of any further energy demand reduction measures such as retrofitting buildings. To understand the scale of change in energy use, Figure 63 shows the change in fuel use between 2019 and 2050, whereas Figure 64 shows the associated changes in emissions associated with those fuels. These graphs highlight the fact that neither demand reduction nor fuel switching/technological change can provide a solution on its own – both will need to play an important role.

Figure 63. Energy use by fuel in 2050 scenario

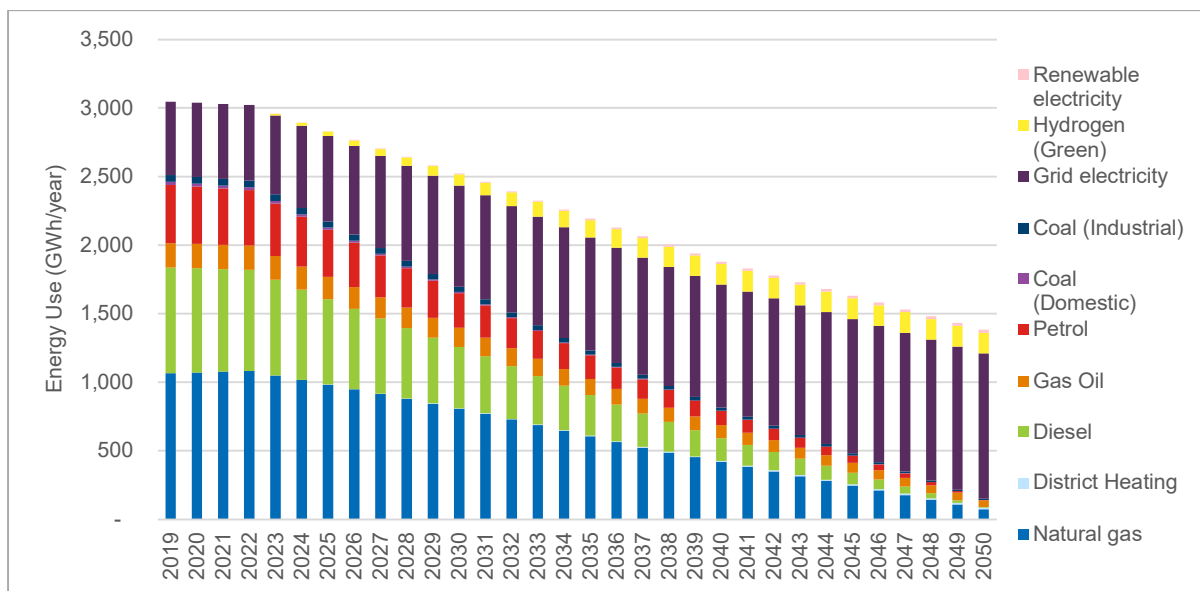
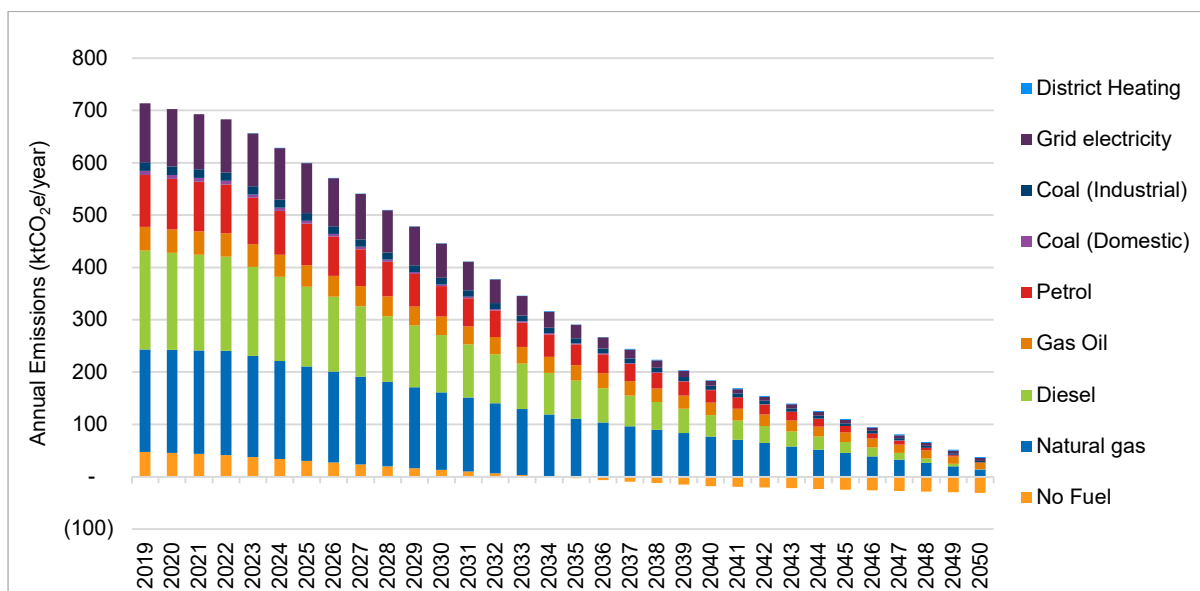


Figure 64. Emissions by fuel in 2050 scenario



Moreover, energy demand reduction should be seen as a *prerequisite* to fuel switching, for various reasons, some examples of which are given below.

- In some cases, it is a technological prerequisite. For example, although heat pumps work in poorly insulated buildings, they operate at lower efficiencies, use more energy to keep the

building at a comfortable temperature, and it will take the building longer to heat up. So, it is critical for heat pumps to be installed after or alongside energy efficiency measures. This is not only an issue of comfort, but also finances, as people will be less likely to switch to heat pumps before the gas boiler ban if this results in a substantial increase in their energy bills.

- Because it is likely that both cars and buildings will mostly utilise electricity, it is estimated that electricity demand could more than double nationally. It is therefore necessary to reduce the strain on existing grid infrastructure, which would require considerable reinforcement to expand capacity, likely resulting in higher energy costs. The electricity would also need to be supplied with renewables, such as large-scale wind and solar farms, which have implications for land use and landscape character, among other things.
- For activities where fossil fuels are not being replaced by electricity but some other alternative, in some cases it will be challenging or impossible to scale up unless demand reduces because of the limited supply of other zero carbon fuels. Examples include 'green' hydrogen (i.e., produced by electrolysis using renewable electricity) or 'sustainable' biomass (which in addition to issues of where it is sourced, would need to be accompanied by advances in carbon capture and storage technologies).
- Demand reduction is also important because it helps to mitigate the other resource requirements (materials, minerals, land, water, labour, etc.) that are required to supply the energy. It also delivers various wider co-benefits, such as improving energy security, reducing fuel bills, helping to alleviate fuel poverty, and mitigating other environmental impacts.

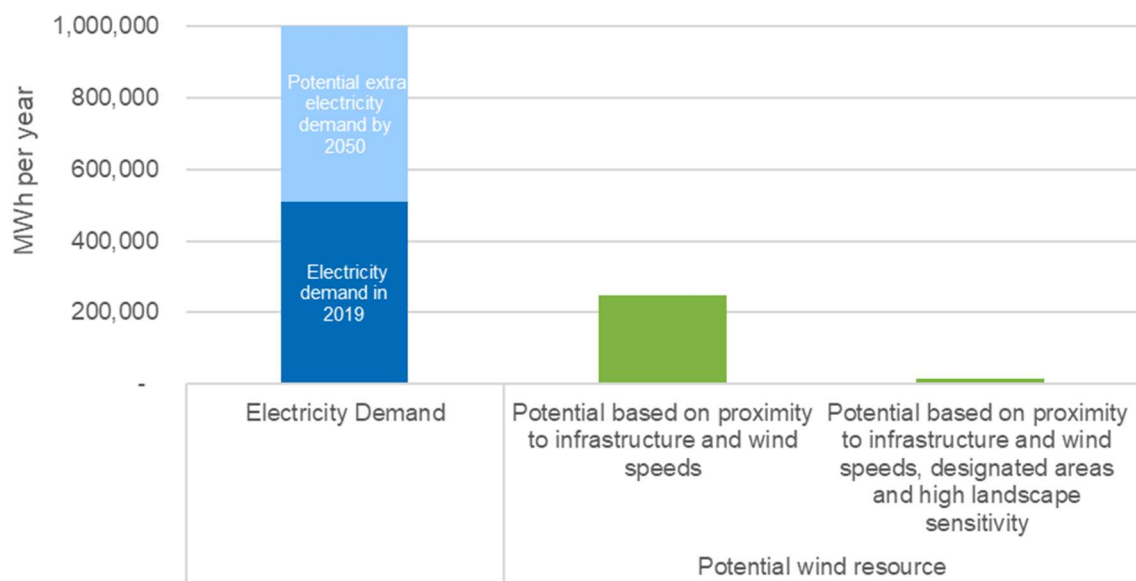
For context

If the entire electricity demand in 2050 was to be met with 100% renewable electricity, this would roughly double the annual electricity use of Mid Sussex. This could be met with *approximately*:

- 1,060 MW of PV (occupying c. 13 square kilometres, around 4% the area of Mid Sussex); or
- 505 MW of onshore wind power (c. 252 large-scale turbines).

In theory, a significant amount of this demand could be met with renewable energy developments within Mid Sussex³³ but this resource is significantly constrained by the current policy landscape, as shown in the chart below. This is just one example of why it will be so challenging to achieve net zero, and how the policy landscape – not just in Mid Sussex but across the whole country – will need to comprehensively change if the target is to be met.

Electricity demand vs. potential wind resource in Mid Sussex

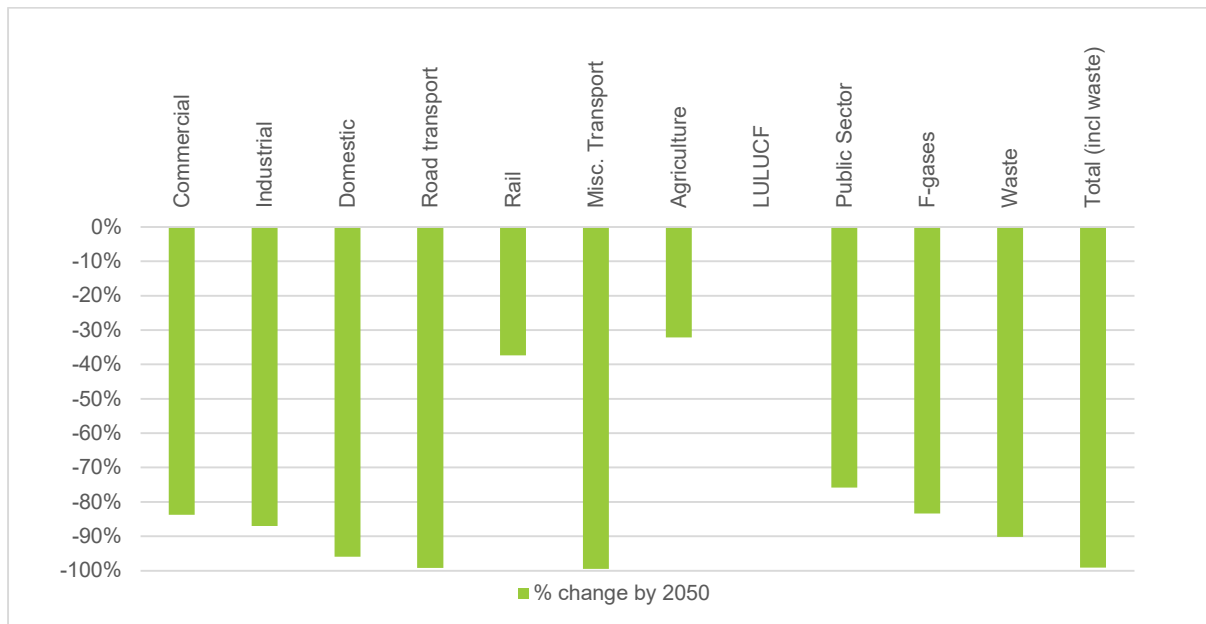


Source: Baseline Assessment (see Section 3.1) and West Sussex Renewable Energy Study (2009)

Considering future emissions in Mid Sussex now by sector, Figure 65 shows that the largest reductions are seen in the transport and domestic sectors, which decrease by 99% and 96% respectively by 2050. The smallest reductions can be seen for agriculture and rail with 33% and 37% respectively. The agriculture sector is particularly difficult to decarbonise as it is dominated by non-CO₂ emissions from livestock and crop production (e.g., use of fertiliser), which are hard to eliminate given the inherent biological and chemical processes involved.³⁴ The LULUCF sector currently shows no change as increases to carbon sequestration were not modelled.

³³ <https://www.midsussex.gov.uk/media/2600/west-sussex-renewable-energy-study.pdf>

Figure 65. Change in emissions by sector between 2019 and 2050



By 2050, the residual annual emissions would be roughly 6 ktCO₂e. To meet net zero, this would have to be compensated for either using carbon removal technologies (which are highly speculative and not yet commercialised) or via nature-based solutions such as woodland creation.

For context

According to the Woodland Carbon Code: “A new native woodland can capture 300-400 tonnes of CO₂ equivalent per hectare (tCO₂e/ha) by year 50, and 400-500 tCO₂e/ha by year 100.”³⁵ On that basis, offsetting the 6 ktCO₂e of annual emissions in 2050 would require roughly 15-20 hectares (0.15-0.20 km²) of new woodland to be created – *and then maintained for at least 100 years*.

To be clear, that would only make up for one single years’ worth of residual emissions, and there would be a time lag of roughly a century before the required amount of carbon was actually removed from the atmosphere, as it takes time for woodland to mature.

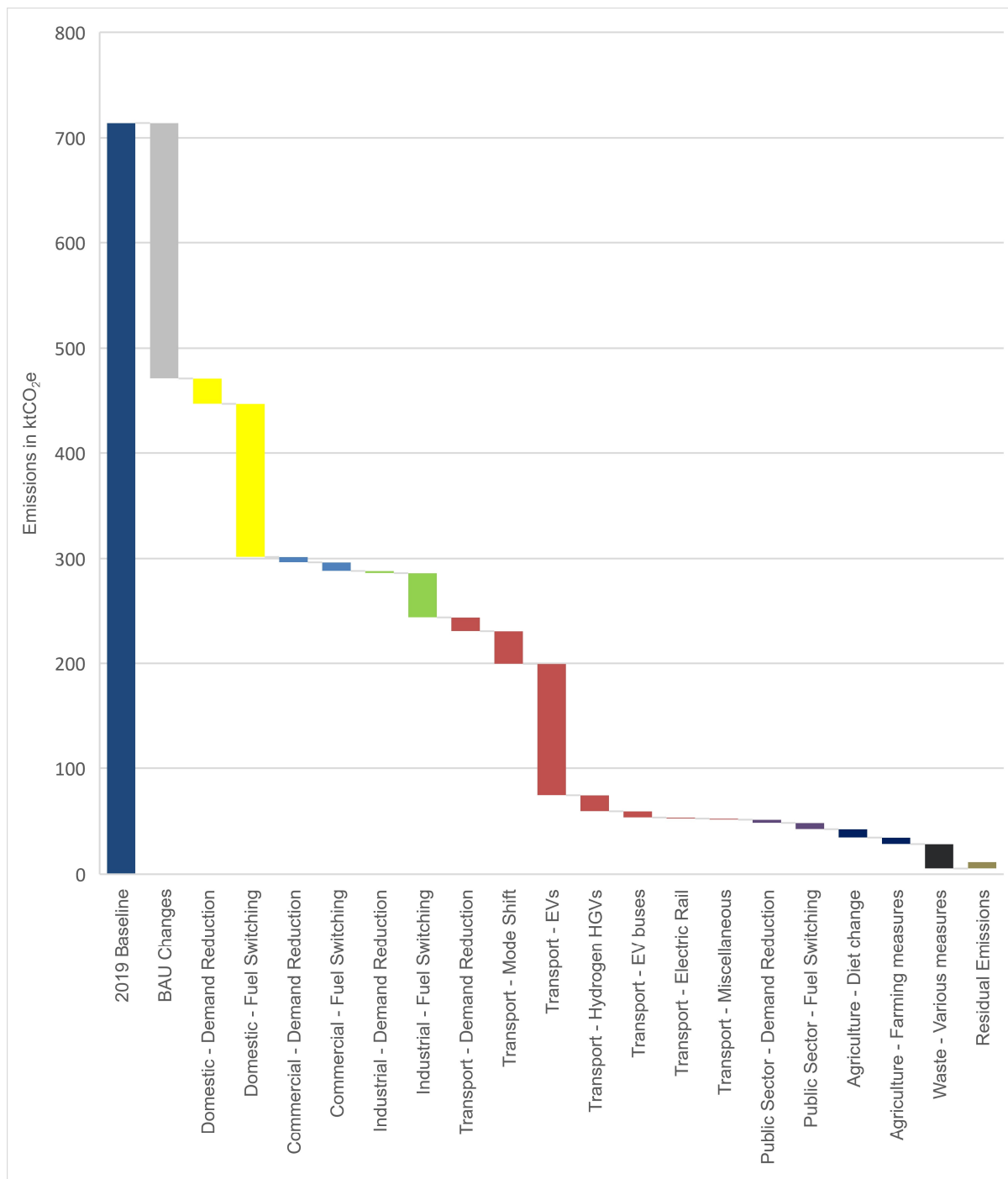
This degree of offsetting is potentially feasible but can only be done if all of the other (ambitious!) mitigation actions modelled in this scenario are implemented. A lack of action in other areas would quickly increase the carbon sequestration need to an unachievable level.

Despite those caveats, this analysis has assumed that one or both of those options (technological or nature-based solutions) would be feasible in future and therefore that net zero could be achieved in Mid Sussex by 2050.

A more detailed breakdown of the mitigation actions is provided in Figure 66 below. When interpreting this chart, note that the impact of each measure depends not only on its ambition, but also on what proportion of baseline emissions it targets. Hence, reductions in the transport sector are the largest because that is the single largest-emitting sector.

³⁵ <https://woodlandcarboncode.org.uk/>

Figure 66. Emissions reduction by type of intervention measure



Note: Due to their small impact and to keep the figure readable, PV measures were removed from the domestic, commercial, and industrial sectors, therefore showing a small gap to net zero.

The largest emissions reduction (in absolute terms) is required in the buildings and transport sectors (see Figure 62). The following sections provide more detail about the mitigation measures modelled and what they would mean in practice.

3.3.3.1 Reducing emissions from buildings

- The net zero scenario assumes a 12% reduction in demand for space heating and hot water across the domestic building stock, and a 25% reduction in the public and non-domestic sectors in line with the ‘Balanced Pathway’ of the CCC’s Sixth Carbon Budget. In practical

terms, given that different properties will be easier or harder to upgrade, this would require deep energy retrofits in at least 50% of all homes.

- Further, in line with the CCC's 'Balanced Pathway', the scenario assumes an uptake in heat pumps of 86% by 2050. A further 11% of properties switch to hydrogen boilers, leaving 3% that do not switch. It is worth highlighting that there is considerable uncertainty as to the preferred role of hydrogen in heating buildings, and it may not be a viable option. This uncertainty is highlighted by the CCC's assessment which assumed the 11% to be the most likely outcome but with a range of 0% to 71%. The government will only make a decision on the role of hydrogen in the UK's net zero journey in 2026, emphasising the need for a focus on existing technologies in the meantime, namely heat pumps.³⁶
- Finally, the scenario assumes that around 20% of heat demand within public sector buildings is met via district heat networks (DHNs), opportunities for which have been previously identified in East Grinstead, Burgess Hill, Haywards Heath, and Lindfield. This is based on a very rough estimate of the potential heat loads but in the absence of more detailed studies is intended only to reflect the potential order of magnitude.³⁷

3.3.3.2 Reducing emissions from transport

- The scenario assumes that 4% of car trips can be avoided through behaviour change, such as working from home, online shopping, and the introduction of workplace parking levies. This is consistent with the lower bound of the CCC's Balanced Pathway figure. While the Government has the ambition to switch 50% of *urban* trips to active travel by 2030 – i.e., walking and cycling –³⁸ no such target has been provided for the rural part of the country. As such, a comparatively conservative estimate of 9% (CCC) was used instead (also the lower bound of the Balanced Pathway assumption). This will mainly be realised in the district's towns where active travel can replace shorter journeys due to the relative density of amenities. The more rural areas will need to focus on an expansion and decarbonisation of the public transport network.
- The majority of emissions are avoided through a switch to fully electric vehicles, assuming that by 2050, close to 100% of cars, vans, and motorcycles are fully electric in line with Government targets.³⁹ Additionally, both bus and rail are assumed to be fully electrified by the target year while 99% of HGVs are assumed to run on hydrogen by 2050. As vehicles – other than the council-owned fleet – come from private purchases, this will mainly be realised through the free market, guided by the national sales ban of petrol and diesel vehicles by 2030. Nonetheless, the Council will play a role in ensuring that the required charging infrastructure is in place as this is currently insufficient. It should be noted that while EVs play a substantial role in reducing emissions from road transport, the behaviour change measures should not be neglected by any means as they have the potential to realise various co-benefits which cannot be achieved through a switch to EVs.

³⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

³⁷ This assumption is based on the information provided in the MSDC Sustainable Energy Study. A rough estimate was calculated by using the information provided in Table 4.6 of that study, along with CIBSE benchmarks of typical heating fuel consumption and assumptions about typical floor areas based on analysis of DEC data for Mid Sussex. This is intended merely as a high-level estimate to compare the potential for public sector DHN connections in the district as compared with the CCC estimates of the potential across the whole UK. Note that the previous energy study is now likely to be out of date and any DHN schemes would clearly need to undergo additional feasibility assessments. <https://www.midsussex.gov.uk/media/2591/mid-sussex-sustainable-energy-study-report.pdf>

³⁸ [net-zero-strategy-beis.pdf \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

³⁹ [net-zero-strategy-beis.pdf \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)






3.3.3.3 Reducing other sources of emissions

While buildings and transport make up the vast majority of baseline emissions and can, to a large extent, be mitigated by reducing energy demand and switching to renewable electricity using available technologies, there will be some remaining sources of emissions that are more challenging to eliminate. For Mid Sussex, the main examples are industry (particularly processes that use fossil fuels to provide heat), waste and agriculture (particularly non-CO₂ emissions whether from waste, livestock, or fertiliser applications).

Industry: At present, a significant portion of fossil fuel use in industry is used to supply heat, which is used for a variety of industrial processes. In addition to having very limited data available to support recommending specific interventions, in some cases there is no electrically powered alternative to the technologies currently in use. So, the solution will likely be a combination of some renewable electricity along with green hydrogen, bioenergy with carbon capture and storage (BECCS). This scenario assumes that 100% of fossil fuels in the industrial sector will be switched to one of these zero emission alternatives by 2050. However, it is important to acknowledge that the solutions in this regard are uncertain – and may change over time, as illustrated in Figure 67 which shows the CCC’s recommendations for the most appropriate use of biomass in a low carbon economy.

Figure 67. Role of biomass in achieving emissions reductions over time. Source: CCC⁴⁰

Between now and 2050, the current uses of biomass in the UK need to change:

	Most effective use today	2020s and 2030s	By 2050
 Bioeconomy	Wood in construction	Wood in construction, potentially other long-lived bio-based products (within circular economy)	
 Buildings	Biomethane, local district heating schemes and some efficient biomass boilers in rural areas	Only very limited additional use for buildings heat: niche uses in e.g. district heat and hybrid heat pumps	
 Industry	Biomass use for processes with potential future BECCS applications		BECCS in industry alongside other low-carbon solutions
 Power	Ongoing use in power sector in line with existing commitments or small scale uses	Demonstration and roll out of BECCS to make H ₂ and/or power	Biomass used for H ₂ production or power with CCS
 Transport	Liquid biofuels increasingly made from waste and lignocellulosic feedstocks	Liquid biofuel transitioning from surface transport to aviation, within limits and with CCS	Up to 10% aviation biofuel production with CCS

Maximising abatement means using biomass to sequester carbon wherever possible (opportunities to do this will increase over time)

Waste: The CCC assumes that 75% of emissions from waste can be cut through a variety of measures including waste prevention, increased recycling rates, landfill bans, landfill methane capture, and CCS at EfW plants.



Agriculture: In the agriculture sector, the main actions are diet change (the CCC recommends a 35% reduction in meat consumption compared to today’s level for the Balanced Pathway), land release measures (such as productivity improvements and moving horticulture indoors), low-carbon farming practices (reducing emissions from soils, livestock, and waste and manure management), as well as fossil fuel use in agricultural machinery. All measures combined reduce agricultural emissions by 33% in addition to the BAU reduction of 4%. It is acknowledged that these are rough estimates, given that many of these changes would vary and have uneven impacts geographically.

⁴⁰ [Biomass-in-a-low-carbon-economy-CCC-2018.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/wp-content/uploads/2018/07/Biomass-in-a-low-carbon-economy-CCC-2018.pdf)

3.3.4 Accelerated net zero pathway (2040)

Realistically, the UK’s 2050 target will mean that some Local Authorities need to make faster progress than others, and this will depend on both the scale of emissions in each area as well as the sources of those emissions, i.e., whether they are from sectors that are hard to abate. With that in mind, in addition to the 2050 scenario, consideration has been given to whether it would be possible for Mid Sussex to reach net zero in advance of the national target.

The evidence collected as part of the baseline analysis shows that there are some important reasons why it may be *easier* to reach net zero in Mid Sussex compared with some other UK Local Authorities.

	Opportunity	Further details
	A high proportion of the district’s emissions can be mitigated with existing technologies.	Emissions in Mid Sussex are dominated by the domestic sector and road transport – and there are technologies already available that can displace nearly all of the fossil fuel use in those sectors. So, once the electricity grid reaches zero emissions there would be very large emissions reductions in those sectors. The Government has stated an ambition for the grid to reach net zero by 2035. This means that a large-scale push towards electrification of heating and transport would deliver major benefits for Mid Sussex. There would be considerable practical challenges in achieving this (summarised below), but at least there is a known solution that uses proven technologies.
	Because the district is predominantly rural, there is land available for projects that can help mitigate emissions. These can provide benefits not only for Mid Sussex, but also the wider UK.	In principle, there should be more opportunities to achieve carbon reductions through changes in agriculture and land use practices, compared with more built-up areas. A key intervention would include releasing agricultural land for other uses e.g., woodland creation. This potentially offers a major opportunity for Mid Sussex and if done correctly would also deliver significant wider ecological benefits – recognising that biodiversity issues are as important as climate change. Such projects would need to be carried out in a way that avoids emissions ‘leakage’, i.e., if the same farming activities are simply relocated elsewhere. There is also more space to deliver large-scale renewable energy projects and/or bioenergy crops, albeit recognising the areas of landscape sensitivity. These interventions would not necessarily decrease emissions from Mid Sussex ‘on paper’, because renewables would contribute towards national grid decarbonisation and BECCS facilities might be located outside of the district. However, they could still deliver overall benefits to the UK that will be important for reaching the national net zero target.

To illustrate the potential impact that these opportunities could have, an accelerated carbon pathway has been developed that aims to reach net zero by 2040. This pathway assumes that the same changes occur as in the BAU scenario, but in addition:

- a) The Government delivers on its ambition for UK grid electricity to be net zero by 2035.
- b) As a result, it becomes more advantageous to push for higher levels of electrification in buildings and transport. Doing so would achieve faster emissions reductions and also minimise *cumulative* emissions over time, which is critical for achieving the Paris Agreement targets. It is therefore assumed that 100% of buildings switch to electric heating systems, and 100% of vehicles (other than HGVs) switch to EV.

- c) All other industrial fossil fuel use is displaced by green hydrogen, BECCS or some combination of the two. The rationale is that green hydrogen might be more widely available due to the large-scale increase in renewables implied by point (a). In principle, some bioenergy could also be produced within Mid Sussex to feed into a BECCS supply chain; however, at the time of writing those technologies are not yet commercialised.
- d) Similar changes in the agricultural and waste sectors are achieved as in the 2050 scenario, but these have been adjusted to reflect the shorter timeframe for uptake. In particular, the shift in the agricultural sector will likely take more time to realise and as some of the waste measures rely on new technologies such as CCS and EfW plants.

The modelling shows that a combination of (a) grid decarbonisation and (b) electrification of heat and transport alone would reduce emissions in Mid Sussex by roughly 90%. A further reduction of around 5% would be achieved if (c) industry was fully decarbonised, while (d) agriculture and waste measures would make up most of the remaining 5%. At that stage, Mid Sussex would essentially have achieved net zero for its area-wide emissions – *provided that steps are taken to avoid any other increase in emissions, whether from energy, land use, or any other sources.*

This is illustrated in Figure 68 to Figure 70 below. In particular, and as with the 2050 scenario, a comparison of energy use versus emissions by fuel type shows how the level of progress is dependent on grid decarbonisation.

Figure 68. Emissions by sector in 2040 scenario

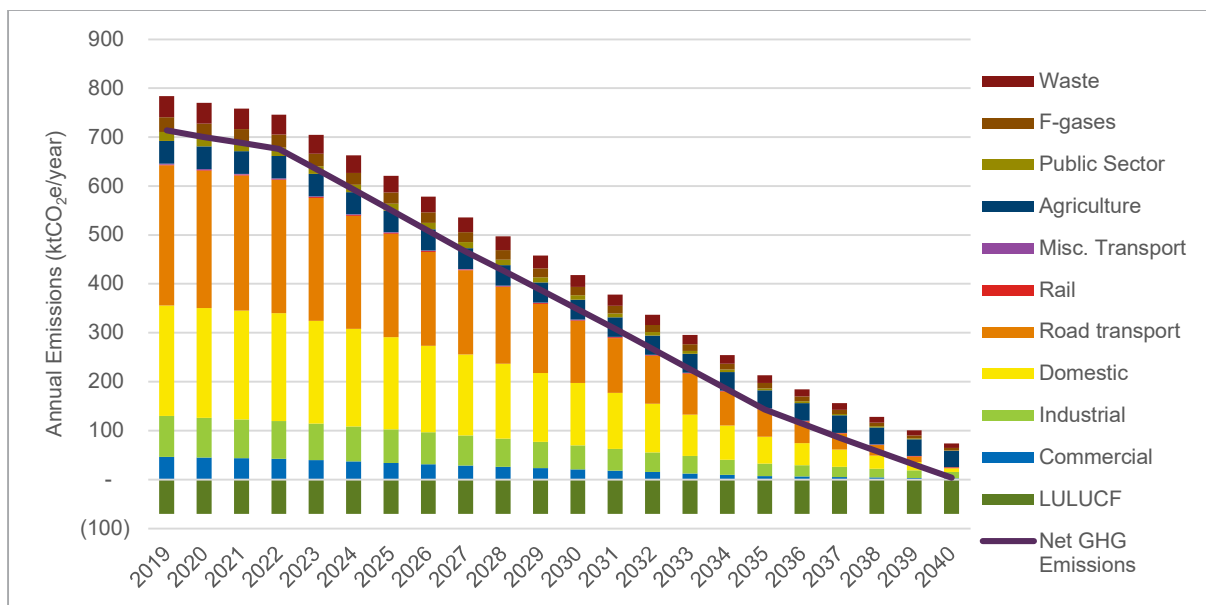


Figure 69. Energy use by fuel in 2040 scenario

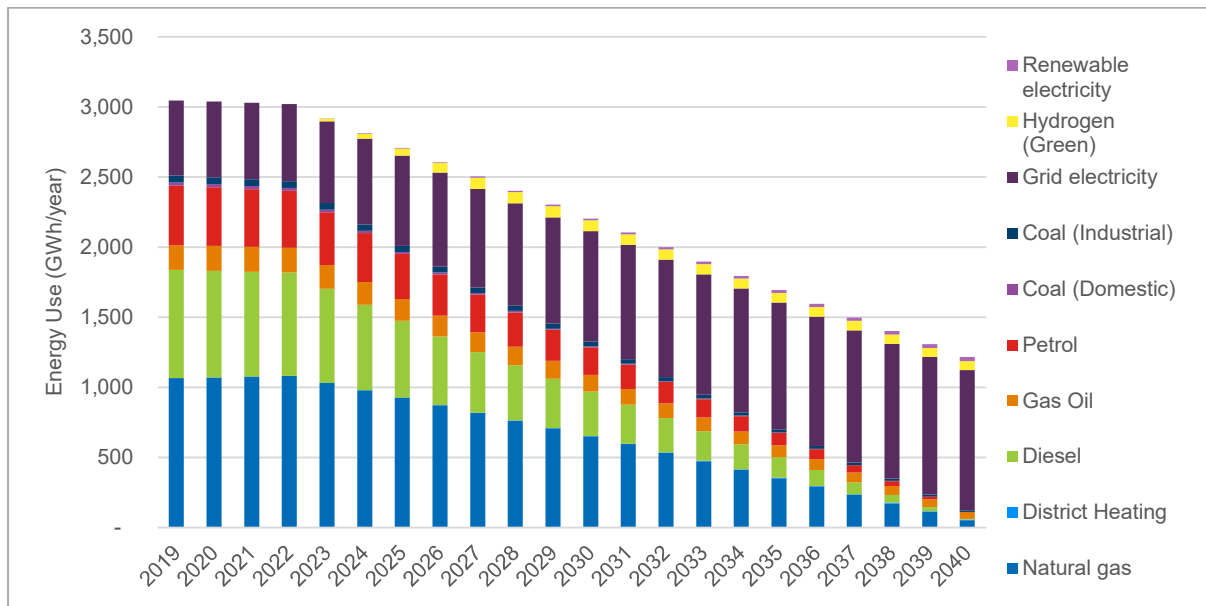
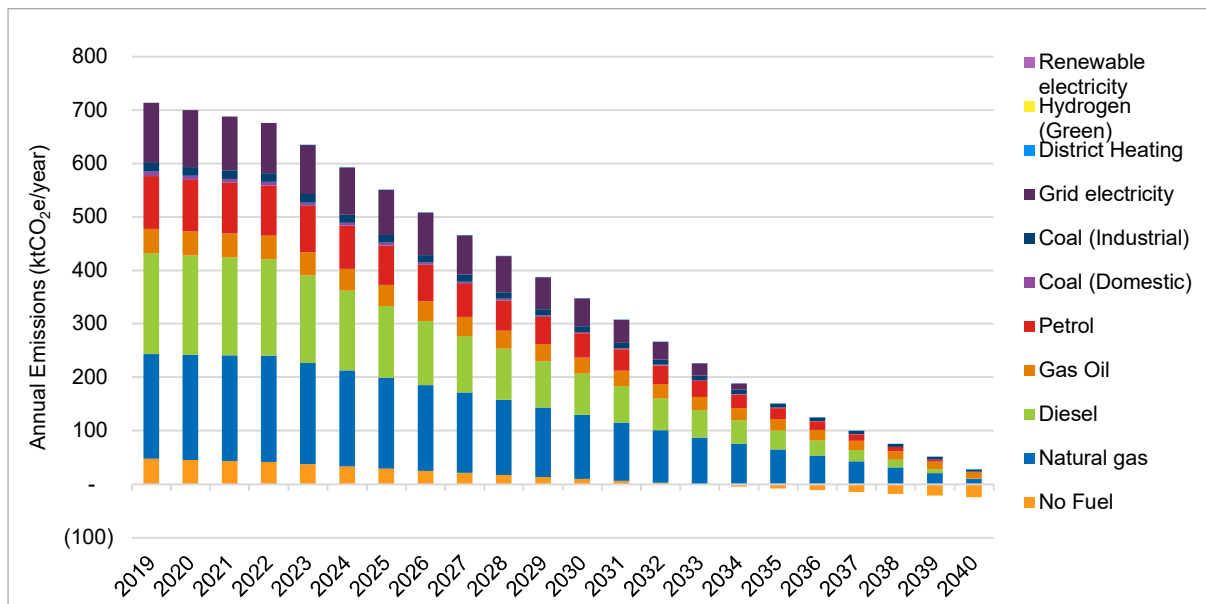


Figure 70. Emissions by fuel in 2040 scenario



It is important to acknowledge that the Government aspiration for grid electricity is not certain to be met and is considered ambitious in the context of current UK energy policy. If the rate of grid decarbonisation is lower than the Government hopes, the same measures would only reduce emissions by 50-80% by 2040. Among other things, these results reinforce the points that:

- Reaching net zero in Mid Sussex will rely on wider changes across the UK (though this in no way minimises the importance of actions taken within the district); and
- Even though there are technological solutions available, they are not a ‘silver bullet’. Again, a credible pathway to net zero will need to include other forms of demand reduction, including behaviour change.

Although electrification offers a major opportunity to decarbonise heat and transport in Mid Sussex from a purely technological standpoint, it would still require huge effort to overcome obstacles. The major challenges differ for transport versus heat and buildings, as summarised below.

- **Transport:** EVs have rapidly decreased in cost which has resulted in higher uptake. The Government has also proposed a ban on the sale of new petrol and diesel cars and vans by 2030. If implemented, then considering the average lifespan of vehicles, the majority would be EV by 2040, assuming that sufficient charging infrastructure is available.⁴¹
- **Heat and buildings:** Among the major practical challenges, three stand out:
 - **Cost:** At present, heat pumps are much more expensive than boilers and it is not certain how fast the costs will come down. The Government has promised⁴² to work towards achieving this but the specifics have not been announced.
 - **Retrofitting is a prerequisite:** Due to the impacts on fuel bills as well as system performance, electric heating systems (whether those are heat pumps or any other form) need to be installed in buildings that are already reasonably energy efficient. In other words, the rollout would need to be preceded by a large-scale retrofitting initiative. At present there is very little funding (existing or planned) available to achieve this.
 - **Natural replacement cycles:** The average lifespan of a boiler is around 15 years. So, replacing all fossil fuel heating systems by 2040 would require an almost immediate ban on new ones being sold or installed. That is not within MSDC's legal remit, and the Government is not considering introducing such a ban until c. 2035, so it is not clear how this would be achieved. Also, heating systems are usually replaced when they break, which is usually in winter (the heating season). Therefore, replacement normally needs to happen very quickly, and a like-for-like solution is often the most practical.

Furthermore, significant action will be needed to avoid any *increase* in emissions. For example:

- **New developments:** The BAU projections account for some growth in domestic emissions, but the actual change will be determined largely by future Building Regulations. The Government has announced plans for the Future Homes Standard to reduce emissions by 75-80% compared with current standards but has not yet announced how this will be achieved.
- **Land use, land use change and forestry (LULUCF):** Projections for England show that the impacts of continual deforestation, converting grassland to cropland, and new settlements will result in worsening emissions from the LULUCF sector. This risk is particularly relevant to Mid Sussex given the amount of land used for agriculture. On the other hand, there could be complicated trade-offs – and potentially net benefits – if less land is used for grazing livestock and more is used to supply people with plant-based diets. So, any actions taken to address agricultural land uses would need to take a holistic view and be done in coordination with industry bodies and other Local Authorities.

What does this mean for Mid Sussex?

These results show that, with significant tailwinds, it would theoretically be feasible for emissions in Mid Sussex to reach net zero (or get very close) prior to 2050. The vast majority of emissions can be addressed using existing technologies. The remaining 5-10% of emissions reduction would rely on changes that are less certain, such as a shift in land use and agricultural practices, waste management, behaviour, and technological advances (particularly CCS). Despite the challenges, overall, this means

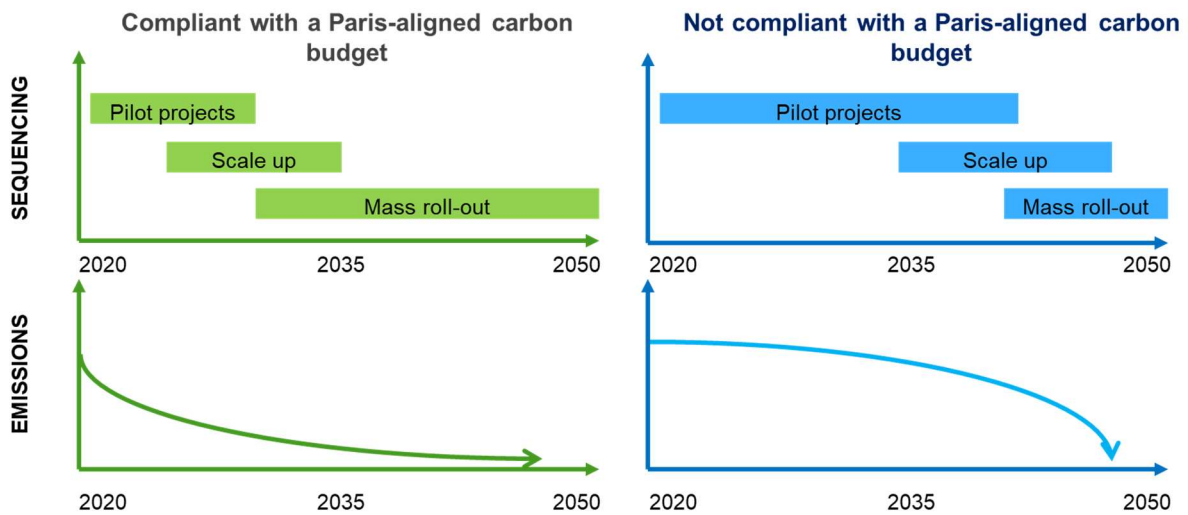
⁴¹ Due to the wider resource implications of producing battery vehicles, there must also be a large-scale behavioural shift to reduce transport demand, even though from a strict carbon accounting perspective this would have minimal or no impact on emissions within the MSDC area boundary.

⁴² In the Heat and Buildings Strategy (October 2021) the Government announced that there will be a consultation on options for working with industry to drive down costs. [Heat and buildings strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/heat-and-buildings-strategy)

that Mid Sussex is at an advantage compared with some other Local Authorities. This is a positive message, and a useful starting point for developing a net zero roadmap.

Ultimately, every Local Authority will need to take urgent action to achieve carbon reduction, despite the challenges this entails. It is not only the net zero target date, but the speed of decarbonisation, that makes a difference. As shown in Figure 71 below, delaying action results in much higher cumulative emissions over time, and these need to be managed in order to stay within a carbon budget that is aligned with the Paris Agreement targets.

Figure 71. Emissions trajectory under a Paris-aligned budget



4 CONCLUSIONS

This report provides a detailed evidence base around the pathways to net zero both for Mid Sussex District Council's own GHG emissions and for the GHG emissions across the whole of the district. It shows what will be needed to deliver net zero emissions in both cases and what some of the main benefits, barriers and challenges will be. This evidence base will underpin the development of net zero action plans at the Council and district level.

APPENDIX A – KEY POLICIES, PLANS AND STRATEGIES INFLUENCING GHG EMISSIONS IN MID SUSSEX

Coverage	Target or objective	Driver / mechanism
International	Limit global temperature increase to 2°C and pursue efforts to limit global temperature increase even further to 1.5°C	Paris Climate Agreement
International	To be agreed: Protect 30% of land by 2030	Convention on Biological Diversity
National	By 2050, reduce net emissions by 100% compared with a 1990 baseline	Climate Change Act (2050 Target Amendment Order) 2019
National	By 2035, a 78% reduction in UK territorial emissions on 1990 levels	The sixth Carbon Budget
National	Drive supply and demand of ultra-low emission vehicles and ensure a fit for purpose infrastructure to support the shift to electric vehicles <ul style="list-style-type: none"> The sale of new petrol and diesel cars and vans will be prohibited by 2030 and all new cars will be fully zero emission at the tailpipe from 2035 Decarbonise the whole central government fleet of 40,000 cars by 2027 The sale of all non-zero emission HGVs will end from 2040, with lighter HGVs from 2035 	Transport decarbonisation plan
National	To successfully decarbonise the UK’s energy systems, the UK’s government has set a number of national-level targets, including to increase offshore wind from 10GW (2019 levels) to 40GW by 2030 as well as growing the installation of electric heat pumps from 30,000 per year to 600,000 per year by 2028	Energy White Paper: Powering our Net Zero Future
National	To ensure the UK’s industrial sector is aligned with net zero, the government ambition to reduce industrial emissions by two-thirds by 2035 and by at least 90% by 2050 with 3 MTCO ₂ captured through Carbon Capture, Usage and Storage and around 20TWh switching to low carbon fuels by 2030	Industrial Decarbonisation Strategy
National	Tackle long-term problems to deliver growth which creates high-quality jobs across the UK	Build Back Better: Our plan for growth

<p>National</p>	<p>2021: An interim uplift will deliver high-quality homes that are expected to produce 31% less CO₂ compared to current standards 2025: Zero-carbon ready homes. The report also aims to clarify the longer-term role of local planning authorities in determining local energy efficiency standards. 2028: 600,000 heat pump installations per year 2030: Improve around 1.5 million homes to EPC C standard</p>	<p>The Future Homes Standard</p>
<p>National</p>	<p>Double resource productivity and eliminate avoidable wastes by 2050 75% recycling rate for packaging by 2030 65% of municipal waste (by weight) to be recycled by 2035 with no more than 10% ending in landfill Eliminate food waste to landfill by 2030</p>	<p>Our Waste, Our Resources: A Strategy for England (2018)</p>
<p>National</p>	<p>Increase woodland coverage from 10.1% to 12% by 2050</p>	<p>England Trees Action Plan 2021 to 2024</p>
<p>Regional</p>	<p>Four scenarios for decarbonisation of the UK's energy system</p>	<p>Distribution Future Energy Services (UKPN)</p>
<p>Regional</p>	<p>The group of three LEPs aim to deliver clean growth, whilst continuing to provide an affordable, sustainable and secure energy supply. The plan has two main goals, 1. the tri-LEP Region will play a leading role in the UK's decarbonisation, 2. the tri-LEP region will foster clean growth by supporting public and private sector investments in novel low carbon technologies</p>	<p>'South2East Local Energy Strategy', Coast to Capital, Enterprise M3 and South East Local Enterprise Partnerships</p>
<p>Regional</p>	<p>The strategy establishes how West Sussex County Council can build upon the work completed to date and address the key issues facing the authority, whilst looking for ways to support its residents</p>	<p>'West Sussex Energy Strategy, West Sussex County Council</p>
<p>Regional</p>	<p>The strategy sets out the first actions for delivering the West Sussex Energy Strategy. It spans a three-year period, and will be monitored and reviewed regularly.</p>	<p>'West Sussex Energy Strategy Action Plan', West Sussex County Council</p>

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<p>Regional</p>	<p>The West Sussex Transport Plan 2011-26 sets the strategy for guiding future investment in highways and transport infrastructure. The plan's main objective is to improve quality of life for the people of West Sussex by helping to provide; a high quality transport network, a resilient low carbon transport network, access to services, employment and housing and finally a transport network that feels, and is, safer and healthier to use</p> <p>In April 2021, there were 194 publicly accessible electric vehicle charging points in West Sussex including 43 rapid (43kw or above) chargers</p>	<p>West Sussex Transport Plan', West Sussex County Council</p>
<p>Regional</p>	<p>The strategy sets out the role of electric vehicles in West Sussex to deliver the county's vision for transport and interventions the county council will deliver to support West Sussex residents to a transition to electric transport</p> <p>Modelling conducted for the strategy estimates that across West Sussex public charging points needs to increase from 89 to 3,305 by 2025, and 7,346 by 2030.</p>	<p>'Electric Vehicle Strategy', West Sussex County Council</p>
<p>Regional</p>	<p>At least 70% of all new cars in the county to be electric by 2030. • There is sufficient charging infrastructure in place to support the vehicles predicted to be reliant on public infrastructure to charge. • Ensure a renewable energy source for all charging points on County Council land or highway.</p>	<p>Electric Vehicle Strategy (2019 – 2030)</p>
<p>Regional</p>	<p>The bus strategy aims to achieve general improvements to the bus network in West Sussex that will improve users' experience and accessibility while achieving broader social, environmental and economic benefits for the county.</p>	<p>West Sussex Bus Strategy 2018 – 2026</p>
<p>Local</p>	<p>The District Plan is the main planning document used by the Council when considering planning applications. Key considerations:</p> <ul style="list-style-type: none"> - minimum provision of 16,390 homes in the 17-year period 2014 – 2031 - Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) 	<p>'Mid Sussex District Plan', Mid Sussex District Council (2018) – and ongoing review</p>
<p>Local</p>	<p>The Economic Recovery Plan has been prepared as a response to the Covid-19 pandemic and sets out over 30 actions which the Council will deliver in line with the government's pillars of economic recovery: Backing Business, Increasing Opportunities, Securing High Value Inward Investment, Accelerating Innovation, and, Encouraging a Green Recovery. Amongst the actions is the Council's Covid-19 Recovery Grant which offers £300k grant support to communities and businesses in addition to government support funding.</p>	<p>'Mid Sussex Economic Development Strategy', Mid Sussex District Council (2018)</p>

Local	Delivered through three themes, a sustainable council, environment and communities, the strategy aims to; embed sustainability in all corporate actions, support communities in implementing sustainable actions and becoming more resilient to a changing climate and support businesses in achieving savings through energy efficiency and other sustainability initiatives.	<i>'Mid Sussex Sustainability Strategy'</i> , Mid Sussex District Council (2018)
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APPENDIX B – NET ZERO SITE AUDIT

A net zero audit was undertaken by Ricardo to inform the measures that were entered into modelling tool. The sites that were selected for the audit were chosen as a representative sample of MSDC’s broader site portfolio. These include:

- Oaklands Main Office
- St Johns Pavilion
- Sheddingdean Community Centre

FINDINGS

The following tables summarise the identified energy saving opportunities associated with each site.

Oaklands Main Office

Opportunity ID	Title			Scope
Opportunity 1	Oaklands - Implement energy management system			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£1,986	41,902	8.8		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£100		0.1	1,986%	£6,775
Description & Assumptions	<p>Whilst energy use is monitored by the Council at a high level and a number of energy saving projects have been implemented, there are no formal management processes in place to ensure energy use is tracked and managed on a systematic basis in order to drive down energy use and associated carbon emissions.</p> <p>To this end it is recommended the Council look to implement a formal energy management system with endorsement from the most senior levels. The system should look to track energy use across the portfolio with heavy focus on the significant energy users such as the Oaklands office.</p> <p>It should consider both technical aspects of energy use and include staff engagement activities. The energy management standard ISO 50001 is useful point of reference however it should be kept in mind that the objectives should be to both reduce energy use and work toward decarbonising the Council's operations.</p> <p>It has been assumed that savings of 3% of electricity and 5% of gas use could be achieved through the implementation of an energy management system.</p>			

Opportunity ID	Title	Scope
Opportunity 2	Oaklands - Implement site wide energy sub metering with energy management software	1

Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£1,986	41902	8.8			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
		0.0	-	£6,873	
Description & Assumptions					
<p>Currently there is little visibility of energy use across the council portfolio and in the significant energy using facilities there there is no visibility of energy use by key areas or processes. Through the use of automatic meter reading (AMR), smart meters and energy submetering it is possible to track and analyse energy use at a more granular level. Energy management software is a powerful tool in the analysis and management of energy where it is possible to identify patterns of use, identify deviations and work toward reduction targets. The use of such tools will become increasingly important in the drive to net zero, for reducing consumption, sustaining savings made, and informing planning and specification of low carbon infrastructure where real world consumption data is key. It is recommended the council rolls out energy sub metering with suitable management software.</p> <p>It has been assumed that savings of 3% of electricity and 5% of gas use could be achieved through the implementation of a sub metering system with energy management software.</p>					

Opportunity ID	Title			Scope																															
Opportunity 3	Oaklands - Convert heating systems from natural gas to electric air source heat pump			1																															
Estimated annual savings			Other savings		ECA/loan eligibility																														
(£)	(kWh)	(tCO ₂)	(£/yr)																																
-£26,457	396,862	40.4																																	
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV																															
£800,000		-30.2	-	-£872,276																															
Description & Assumptions																																			
<p>Current boiler peak capacity:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">West</td> <td style="width: 20%;"></td> <td style="width: 20%;">Wing:</td> <td style="width: 20%;">250kW,</td> <td style="width: 20%;"></td> <td style="width: 20%;">76oC</td> </tr> <tr> <td>North</td> <td></td> <td></td> <td>Wing:</td> <td></td> <td>46kW,</td> </tr> <tr> <td>East</td> <td>Wing:</td> <td>2</td> <td>x</td> <td>260kW</td> <td>=</td> </tr> <tr> <td>Total</td> <td></td> <td></td> <td>=</td> <td></td> <td>520kW</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>826kW</td> </tr> </table> <p>With COP of 2.5 peak electric demand is 330kW</p> <p>Assume use of thermal stores - good space to reuse old boiler oil tank room by east wing boiler house.</p>						West		Wing:	250kW,		76oC	North			Wing:		46kW,	East	Wing:	2	x	260kW	=	Total			=		520kW						826kW
West		Wing:	250kW,		76oC																														
North			Wing:		46kW,																														
East	Wing:	2	x	260kW	=																														
Total			=		520kW																														
					826kW																														
Opportunity ID	Title			Scope																															

Opportunity 4	Oaklands - Optimise BMS and other controls			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£1,809	69,381	13.2		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£10,000		5.5	-12%	-£3,501
Description & Assumptions	<p>Optimise heating controls.</p> <p>Optimise air conditioning controls. It is assumed that savings of 10% of electricity use by HEVAC and related plant and 10% of gas could be realised. Assume costs of £10,000 are to optimise only, limited capital investment.</p>			

Opportunity ID	Title			Scope
Opportunity 5	Oaklands - Reduce consumption by computing and related IT equipment			2
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£442	2943	0.9		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£20,000		45.3	-56%	-£17,990
Description & Assumptions	<p>Prior to the onset of COVID the typical number of daily occupants in the office was circa 400; going forwards it is anticipated the future occupancy levels will be circa 200.</p> <p>Most desk workstations are equipped with 2 monitors whilst staff have either desktop or laptop computers.</p> <p>The majority of monitors are left on when the desks are unoccupied. There is however the opportunity to reduce energy use by implementing measures as follows:</p> <ul style="list-style-type: none"> a) use of computer energy management software to ensure computers operate in energy saving mode and shut down when left unattended. b) instruct staff / fit power sockets to desks to switch off all power to workstations out of working hours. <p>This assumes that IT and computing power accounts for 20% of site electricity and that 5% savings could be realised.</p>			

Opportunity ID	Title	Scope
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Opportunity 6	Oaklands - Implement onsite solar PV				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£22,800	152,000	46.7			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£152,000		6.7	-18%	-£69,438	
Description & Assumptions	<p>Existing system is 28.6kWp Parking space suggests enough space for over 1,000m² of panels. If 2.5m² = 1kWp then enough space for 400kWp.</p> <p>For average summer daily load of circa 1,000kWh, suggest need to expand to capacity to 180kWp (extra 152kWp) in order to minimise summer exports. This means circa 152,000kWh saved pa. Assume £1,000 / kW to install.</p>				

St John's Pavilion

Opportunity ID	Title			Scope	
Opportunity 1	St Johns Pavilion - Remote controls for night storage heating				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£638	4256	1.3			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£1,000		1.6	52%	£1,233	
Description & Assumptions	<p>St Johns Pavilion is heated by electric night storage heaters. There is limited control of the heating and being a tenanted building with multiple users it is apparent the heating is left on continuously regardless of occupancy levels.</p> <p>Installing improved controls with remote access will enable better management of the heating system and this could be coordinated with site bookings; this could be a simple system such as Nest, Hive or equivalent. It is assumed 20% of site heating could be saved with better management.</p>				

Opportunity ID	Title			Scope	
Opportunity 2	St Johns Pavilion - convert external lighting to LED with timers / light sensors			2	
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		

£99	657	0.2		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£250		2.5	21%	£97
Description & Assumptions	Internal lighting has already been converted to LED. Some of the external wall lights are fluorescent and could be converted to LED. 5 units.			

Opportunity ID	Title			Scope	
Opportunity 3	St Johns Pavilion - Install solar thermal heating to supplement existing electric DHW heating				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£393	2619	0.8			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£3,500			-26%	-£2,056	
Description & Assumptions	<p>The shower rooms are principally used in the summer season only. The water is heated all year by electric resistance heaters in the hot water tank (calorifier).</p> <p>To reduce electricity consumption there are 2 options: 1. Fit point of use hot water heaters, or 2. Supplement heating with solar thermal heat collectors.</p>				

Sheddingdean Community Centre

Opportunity ID	Title			Scope	
Opportunity 1	Sheddingdean - Convert gas fired warm air heaters to electric air source heat pump			2	
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
-£437	9711	1.2			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£18,000		-41.2	-	-£19,078	

Description & Assumptions	<p>The heating in Sheddingdean Community Centre is provided by 5 x wall mounted gas fired warm air heaters (5.8kW each).</p> <p>It is recommended the heating system in the main hall is replaced by air source heat pump technology such as a multi split system with 2 or 3 ceiling mounted cassettes in the main hall.</p> <p>Small infrared radiant electric heaters could be used in the toilets and storeroom. The kitchen domestic hot water boiler will have to be converted to electric point of use heater.</p>
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Opportunity ID	Title			Scope
Opportunity 2	Sheddingdean - convert lighting to LED with occupancy sensors			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£240	1601	0.5		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£1,360		5.7	-13%	-£496
Description & Assumptions	The lighting in Sheddingdean Community Centre is predominantly T8 fluorescent tube technology. This could be upgraded/swapped out to LED equivalent.			

Opportunity ID	Title			Scope
Opportunity 3	Sheddingdean - Convert domestic hot water supply from gas fired boiler to point of use (POU) electric water heaters			
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
-£233	-291	-0.3		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£2,000		-8.6	-	-£2,758
Description & Assumptions	<p>Domestic hot water in Sheddingdean Community Centre is provided by a 27kW rated domestic hot water boiler.</p> <p>To decarbonise, the facility will have to either fit electric resistance heating to the hot water tank (calorifier) or fit point of use electric water heaters. It is assumed point of use water heaters will be fitted as this will reduce energy losses</p>			

associated with maintaining a continuously heated tank.

The losses are assumed to be 20% in terms of boiler efficiency and radiated heat. A cost of £2,000 is assumed for converting to POU units.

APPENDIX C – NET ZERO DISTRICT MODELLING ASSUMPTIONS

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
Other operational assets	Electricity	Implement energy management system	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%
		Optimize BMS/BEMS control algorithms and setpoints	3%	2022	1	2022	2	1%	0.5%
		On site solar (car park) – Oaklands Offices - Oaklands Road, Oaklands - East Wing Boltro Road. Scaled to proportion of other operational sites.	57%	2023	2	2025	4	1%	0.5%
	Natural gas	Implement energy management system	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Optimize BMS/BEMS control algorithms and setpoints	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-
Halls & community centres	Electricity	Organisation wide - Improve energy management systems / processes	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%
		On site solar (roof top) – Sheddingdean Community Centre Site - Maple Room	-85%	2023	2	2025	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
	Natural gas	Organisation wide - Improve energy management systems / processes	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 3	2022	2	2032	10	1%	-
Parks & recreational grounds	Electricity	Organisation wide - Improve energy management systems / processes	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Improved heating controls	20%	2022	1	2022	2	1%	0.5%
		On site solar (roof top) – New Pavilion - Mount Noddy Recreation Park St Johns Road East Grinsted. Scaled to proportion of parks & recreational grounds.	4%	2023	2	2025	4	1%	0.5%
Offices	Electricity	Implement energy management system	5%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	0.5%
		Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%
		Improve lighting controls - zones, occupancy controls, dimming	10%	2022	1	2022	2	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Optimise BMS/BEMS control algorithms and setpoints	5%	2022	1	2022	2	1%	0.5%
	Natural gas	Organisation wide - Improve energy management systems / processes	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-
	Waste	Domestic waste prevention and reuse	30%	2022	2	2022	6	1%	-
		90% recycling rate/ 10% incineration. Waste energy heat.	-	2022	2	2022	6	1%	-
Temporary housing	Electricity	Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Improve window and door sealing	5%	2022	1	2022	2	1%	0.5%
		On site solar (roof top). 33 Mocatta Way, Burgess Hill, RH15 8UR. Scaled to proportion of temporary housing.	49%	2023	2	2025	4	1%	0.5%
	Natural gas	External / internal wall insulation, and loft / roof insulation	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	18	2022	28	1%	-
Residential	Electricity	Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%
		Improve window and door sealing	5%	2022	1	2022	2	1%	0.5%
		On site solar (roof top and car park) – Orchards Shopping Centre.	62%	2023	2	2025	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
	Natural gas	External / internal wall insulation, and loft / roof insulation	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-



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SCRUTINY COMMITTEE FOR PLANNING, ECONOMIC GROWTH AND NET ZERO WORK PROGRAMME 2022/23

REPORT OF: Tom Clark, Head of Regulatory Services
Contact Officer: Alison Hammond, Member Services Officer
Email: alison.hammond@midsussex.gov.uk Tel: 01444 477227

Wards Affected: All
Key Decision: No

Purpose of Report

1. For the Scrutiny Committee for Planning, Economic Growth and Net Zero to note its Work Programme for 2022/23.

Summary

2. Members are asked to note the attached Work Programme. The Work Programme will be reviewed as the final piece of business at each meeting, enabling additional business to be agreed as required.

Recommendations

3. **The Committee are recommended to note the Committee's Work Programme as set out at paragraph 5 of this report.**

Background

4. It is usual for Committees to agree their Work Programme at the first meeting of a new Council year and review it at each subsequent meeting to allow for the scrutiny of emerging issues during the year.

The Work Programme

5. The Committee's Work Programme for 2022/23 is set out below:

Meeting Date	Item	Reason for Inclusion
18 October 2023	District Plan - Consultation Draft (Regulation 18)	5 Year Review
18 January 2023	To Be Confirmed	
15 March 2023	To Be Confirmed	

Policy Context

6. The Work Programme should ideally reflect the key priorities of the Council, as defined in the Corporate Plan and Budget.

Financial Implications

7. None.

Risk Management Implications

8. None.

Sustainability Implications

9. None.

Background Papers

None.