

COUNCIL

10 AUGUST 2022



2 August 2022

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

NOTE: There will be limited public access to observe the meeting. Those wishing to do so must reserve a seat by completing a [Registration Form](#) by 4pm on the working day prior to the meeting. Access is also available via a live stream through the [Mid Sussex District Council's YouTube channel](#).

To all Members of the Council,

You are hereby summoned to attend an extraordinary meeting of the **MID SUSSEX DISTRICT COUNCIL** to be held in the **COUNCIL CHAMBER** on **WEDNESDAY, 10TH AUGUST, 2022** at **7.00 pm** to transact the following business:

Yours sincerely,

KATHRYN HALL
Chief Executive

Pages

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|----|---|-----------------|
| 1. | Opening Prayer | |
| 2. | To receive questions from members of the public pursuant to Council Procedure Rule 9. | |
| 3. | To confirm Minutes of the meeting of Council held on 29 June 2022. | 5 - 20 |
| 4. | To receive declarations of Interest from Members in respect of any matter on the Agenda. | |
| 5. | To consider any items that the Chairman of the Council agrees to take as urgent business. | |
| 6. | Chairman's Announcements. | |
| 7. | Site Allocations Development Plan Document. | 21 - 500 |

Working together for a better Mid Sussex



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

**Minutes of a meeting of Council
held on Wednesday, 29th June, 2022
from 7.00 pm - 9.57 pm**

Present: M Belsey (Chairman)
P Coote (Vice-Chair)

J Ash-Edwards	S Ellis	Anthea Lea
R Bates	R Eggleston	J Llewellyn-Burke
J Belsey	A Eves	G Marsh
A Bennett	B Forbes	C Phillips
L Bennett	L Gibbs	M Pulfer
P Bradbury	I Gibson	R Salisbury
P Brown	S Hatton	A Sparasci
R Cartwright	J Henwood	L Stockwell
P Chapman	S Hicks	D Sweatman
R Clarke	S Hillier	C Trumble
M Cornish	T Hussain	N Walker
J Dabell	R Jackson	N Webster
R de Mierre	J Knight	R Whittaker
B Dempsey	C Laband	

Absent: Councillors G Allen, A Boutrup, H Brunsdon, E Coe-Gunnell White, R Cromie, J Edwards, Andrew Lea, J Mockford, A Peacock, S Smith and R Webb

1. OPENING PRAYER.

The opening prayer was read by the Vice-Chairman.

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

The following question was received from Mr Batte

At the recent Stop Cuckstye meeting Jonathan Ash Edwards said, "we need to ensure we are taking account of the Government's changes to the planning system" and cited environmental concerns as a reason for "pausing" the District Plan Review. Please explain why these environmental concerns and the changes to the planning system don't apply to SA12 & SA13 and the DPD?

The following response was provided by the Cabinet Member for Planning:

The District Plan review and the Sites Allocation DPD are at different stages in the plan making process. Plan making is lengthy and complex. All DPDs must go through two rounds of public consultation and an Examination in Public. The Site Allocation DPD is at the most advanced stage in plan making terms. It has been through two rounds of public consultation and a public examination. The independent planning

Inspector has found it sound and legally compliant with legislation. Proposed future changes to the planning system are not yet law, the Sites DPD is therefore unaffected by them.

In examining the Plan, the Inspector reviewed detailed evidence put forward by all parties, including ecological reports and assessments, and concluded that the sites were sound and capable of adoption. Policies SA12 and SA13 include specific requirements regarding Green Infrastructure, conserving and enhancing wildlife value and ensuring a net gain to biodiversity. These will all need to be satisfied at the planning application stage.

It is now up to the Council to either adopt the Sites DPD or not. In comparison the District Plan review is at a very early stage. All the evidence is still being gathered and no decisions have been made. It has not yet been through the first round of public consultation.

The following question was received from Ms Green

If you as you said in January & again this month, you need to "pause" the District Plan Review - an agreed part of the District Plan process - why can't you pause (not stop altogether) the Site Allocations DPD until the new planning legislation comes in? This would not only benefit the people of Burgess Hill who want to save Sites SA12 & SA13, but residents of all the towns and villages in the district negatively affected by this DPD. Why will you not take this step, when the changes in law are coming soon?

The following response was provided by the Cabinet Member for Planning:

Thank you for your question which provides me with an opportunity to clarify the situation.

Plan making is a very complex area and in fact it never stops. When the Council adopted the District Plan in March 2018 the Inspector stipulated that the Council must also adopt a Site Allocations DPD to account for the additional housing he had imposed. The Inspector confirmed that the approach to be taken by the Council, to bring forward a Sites DPD at an early date, was sound.

Separate to this, the Council is also required to review the District Plan every 5 years. This review started in 2021 and the draft was presented to the Scrutiny Committee for Housing and Planning in January this year.

The Committee resolved to delay their consideration of the Plan to enable officers to do more work. This work continues and, once it is completed, as resolved by the Scrutiny Committee, a cross party working group will consider the sites and any proposed changes to the policies. This work will then be scrutinised by the Scrutiny Committee.

The Site Allocations DPD is a 'sister document' to our current District Plan and is at a different stage to the District Plan Review. As outlined in paragraph 36 of the report, under the Planning and Compulsory Purchase Act (2004) the Council can only make a binary choice to either adopt the DPD or not adopt it. Whilst the 5-year housing land supply has been confirmed by an independent Inspector, this assumes the DPD is adopted and the sites in it including Sites SA12 and SA13 will be delivered. Failure to adopt the DPD will place the Council at significant risk of not having a five-year housing land supply leaving the district vulnerable to speculative development, such speculative development is very likely to include sites SA12 and SA13. This is

because now the Sites DPD has been found sound, developers will argue that it is a material consideration in the determination of applications irrespective of whether the Council adopts it or not. Should a planning application be submitted on any of the sites, officers will have to take the Inspector's Report into account in any decision.

It is important to note that during the 7-year period prior to the adoption of the current District Plan, when the Council did not have an up-to-date Plan and was not able to demonstrate a 5-year supply of land for housing, c.3,000 dwellings on greenfield sites were approved. With respect to the Levelling Up and Regeneration Bill the Government has stated it will not be enacted until 2024. In the meantime, the Council must operate within the context of existing legislation.

Finally, I should stress that the Government is clear that Plan making must continue. In his Written Ministerial Statement in January 2021, Chris Pincher (the Minister of State for Housing) stated that "Authorities should not use this period [during the reform of the planning system] as a reason to delay plan-making activities. Authorities who have an up-to-date plan in place will be in the best possible position to adapt to the new plan-making system."

Ms Green asked the following supplementary question:

By the time developers can challenge your five-year land supply the changes to planning law and housing targets will either have been changed or well in hand and will carry weight in any legal defence so why aren't you prepared to take a stand at these sites and defend them from developers at this stage? Also regarding 'Stop Cuck-Stye', Councillor Ash-Edwards said we need to make sure we are taking into account of the Government's changes to the planning system and cited environmental concerns as the main reason for pausing the District Plan review, but you refuse to explain why these environmental concerns and changes to the planning system do not apply to SA12 and SA13. Even Mimms Davis has written to the Secretary of State today to 'urge [him] to urgently relook at the inclusion of these sites.' This would give you a better supported District Plan reflecting the hard work you have done on it. We are not suggesting you throw it out, we suggest you pause it while these sites are looked at again and while change to the planning legislation comes in – so please can you answer that.

It was agreed that a response from the Cabinet Member for Planning will be provided in writing.

The following question was received from Ms Parlett

Objective 8 of your Sustainable Economy Strategy is to "improve, manage and promote biodiversity and nature recovery" and new planning legislation requires a biodiversity net gain of 10%. How does concreting over a rewilded, biodiverse rich ecosystem, such as SA13, fit in with your strategy, and how can 10% net gain ever be achieved by replacing it with a housing estate of 300 dwellings?

The following response was provided by the Cabinet Member for Planning:

Thank you for this question. It is important to note that statutory biodiversity net gain (BNG) requirements do not come into effect until 2023. However, given the Council's commitment to the environment we wanted to ensure BNG was a requirement of all sites coming forward.

I do not agree that Site SA13 will be 'concreted over' as you suggest in your question. The Policy framework for this site is clear that the development should be "informed by a landscape led masterplan, which responds to the setting of the South Downs National Park". The Policy also sets out comprehensive site requirements regarding biodiversity and green infrastructure, including the need to provide a Habitat Management Plan which must set out how the proposals will conserve and enhance all areas of Habitat of Principle Importance (i.e. woodland, hedgerows and standing water).

The independent Planning Inspector, noted that the Ecological Delivery Report, submitted in support of this allocation, confirms that "there are no over-riding ecological constraints to development of the site, and that the proposal could deliver biodiversity net gain overall." The Inspector concluded that any ecological impact on the site 'can be mitigated to an acceptable level' and therefore found the allocation to be sound.

The assessment of any future planning application on this site will have to consider how the detailed proposals submitted accord with the biodiversity requirements of the Environment Act, the NPPF (National Planning Policy Framework) and Policy SA13. All of these sites must go through a rigorous planning application process.

Ms Parlett asked the following supplementary question:

Noting that it is brilliant that you have so much hope in the system as developers seem to get round it. When looking at some ecologist's that come to the site – on their websites they quote that they 'can help you get your planning through' so we find they are biased. We know a screening application has been put through on the site, so they do not have to do a proper environmental study as well. You say they will not concrete over and they will go through correct procedure – how will you manage and monitor that. Persimmon have told us in writing that they plan to clear the site in Autumn. They do that to destroy all the biodiversity there so when it comes to putting a planning application in, they will achieve their 10% net gain as they will already have destroyed it. We know they have been on site. We are asking you to pause this tonight to stop this precious site from being destroyed in the autumn as if you vote to agree this tonight there is nothing to stop them in the autumn as it is their own site.

It was agreed that a response from the Cabinet Member for Planning will be provided in writing.

The following question was received from Ms Corbett

You want to build 300 homes on SA13 but there are already thousands of homes there. Homes to polecats, badgers, snakes & threatened birds like nightingales, what will happen to them? I am very confused as you and the government tell us you are protecting green spaces, but this is a very special one that you are not protecting at all? Why? It really worries me and makes me depressed about my future.

The following response was provided by the Cabinet Member for Planning:

Thank you, Ms Corbett, for your question. I am sorry you are concerned and will try and reassure you.

The Council, in delivering the government's objectives, has a very difficult job to do: we must ensure that there are enough homes for people to live in whilst seeking to protect important natural habitats. Site SA13 is not protected in the same way as a

site that is nationally recognised for protection such as Ancient Woodland or a Site of Special Scientific Interest or the High Weald Area of Outstanding Natural Beauty. However, even in areas which do not have a 'national' protection, the government still wants to ensure that there is a net gain in biodiversity.

Site SA13 is big enough to ensure that areas of existing wildlife value can be protected as well as providing opportunities for biodiversity improvements, whilst still delivering the new homes. The Council's policy requires developers to demonstrate how they will achieve this, and this can be secured as part of any planning permission. The Council wants to ensure that not only are there enough homes to meet local needs for future generations but that we also protect and enhance biodiversity.

Ms Corbett's supplementary question (put by parent, Mr Corbett) noted that anyone who has visited the site will know that a net gain in biodiversity is a fantastically unachievable and urged Members to pause and visit the site as it is teeming with wildlife. To think you can go in there and build for 3 or 4 years and not interrupt the wildlife is naive – how are you going to do that? Also, as there is talk about how the Council holds developers to account, can we see published evidence where the Council has some and metrics on how you measure and enforce that?

It was agreed that a response from the Cabinet Member for Planning will be provided in writing.

The following question was received from Mr Inman

Developers are required to deliver a 10% biodiversity net gain for new developments. Can MSDC and the developers Persimmon and Thakeham give a definitive, 100% cast iron guarantee that building on sites SA12 and SA13 will result in an increase in species?

The following response was provided by the Cabinet Member for Planning:

It is important to remember that site allocations and plan making, and the determination of planning applications are two very separate processes. The Planning Inspector was satisfied that any ecological impact on the site 'can be mitigated to an acceptable level' and therefore he found the allocation of the site to be sound.

When considering a planning application for Site SA13 the Council, will require the applicant to submit evidence to demonstrate how the Policy requirements set out in Policy SA13 regarding biodiversity and green infrastructure will be met. Finally, it is important to remember that biodiversity net gain can, by law, be delivered on-site, off-site or a combination of the two.

Mr Inman noted that there has been no ecological survey before the site was selected and gave assurance that if development SA12 and SA13 go ahead, many birds, animals and plant life will go (citing an extensive list of species). He asked if the development does go ahead, will the Council prove that there has been an increase in diversity.

It was agreed that a response from the Cabinet Member for Planning will be provided in writing.

The following question was received from Mr Brooks

Regarding the Sustainable Economy Strategy, is the Ricardo Action Plan complete yet? If so when will the report be made available? If not, then when is it expected to be finished and have any extra costs been incurred above the initial £47,000 cost?

The following response was provided by the Cabinet Member for Economic Growth and Net Zero

The Action Plan is not yet complete. The first phase of this work is with the consultant and is almost complete which is to baseline our current emissions. That report is imminent, and the next stage is to bring it to Council where we will look at an action plan to achieve Net Zero. We hope to set the target towards the end of this year and once the target is set then an action plan will be in place to achieve it.

To date the Council has expended £47k on this work plus a further £4k to extend the contract. The extension was to take account of covid related delays.

Mr Brooks asked that once Ricardo has finished the action plan, will that be made public, and can we expect it soon?

Councillor Hillier confirmed that the Council will be setting the target towards the end of this year and following that there will be the action plan. Everything will be in the public domain. All Councillors will have a chance to see it and comment on it and it will go through the scrutiny process. It will certainly be in the public domain.

The following question was received from Councillor Moore (Tandridge District Council)

Has the Council fully considered the effect of the MSDC Site Allocation Plan on local residents living on the Imberhorne estate and Felbridge Village?

Local infrastructure is considered overstretched in capacity, namely the Star junction, A22, A264 and M25. Small village roads were not built to take traffic from large housing estates.

Felbridge rural village is being destroyed by urban sprawl with houses being built right up to the boundary.

Gulledge has two herds of deer and much wildlife with awe-inspiring scenery which I have enjoyed over 38 years and wish the next generation to be able to experience.

The following response was provided by the Cabinet Member for Planning:

As a District Councillor yourself you will be aware that Councils have a duty to meet the areas housing needs.

This Council was required by the Inspector to bring forward a Site Allocation DPD. As a Councillor you will be aware the plan making process is both democratic and prescribed. This means any allocation of a site must be evidence based. This includes evidence of any impact on infrastructure and the environment. You will also be aware that this evidence is in the public domain.

Specifically, regarding highways infrastructure, the Inspector carefully considered the evidence and has confirmed in his Report that he is satisfied with the Mid Sussex Strategic Transport Model and associated study and that it is fit for purpose.

You will also be aware that the Plan is subject to two rounds of public consultation and an Examination in Public by an independent planning inspector. Following this the Inspector will either find the plan sound or not sound. In the case of the Site Allocation DPD the Inspector has found the Plan sound. This means he is satisfied that the Council has met all the tests.

Councillor Moore asked a supplementary question noting that Felbridge is a conservative minded village and building on precious farmland is an unpopular choice. If Mid Sussex exceeds its house building target, could it not preserve the beautiful Gulledege farmland and its inhabitants for future generations?

It was agreed that a response from the Cabinet Member for Planning will be provided in writing.

3. TO CONFIRM MINUTES OF THE MEETING OF COUNCIL HELD ON 27 APRIL AND ANNUAL COUNCIL ON 11 MAY 2022.

The minutes of the meeting of Council held on 27 April and 11 May were agreed as a correct record of the meeting.

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

Councillor Gibson declared a personal interest in item 7 as he is a West Sussex County Councillor for Imberdown Division. Councillors Hillier, Bradbury and Liz Bennett also declared that they are West Sussex County Councillors.

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

None.

6. CHAIRMAN'S ANNOUNCEMENTS.

The Chairman noted that the nomination period for the Mid Sussex Applauds Awards is open and encouraged Members to put forward nominations in order to recognise the hard work of residents within the District. She also highlighted the Chairman's Charity Fundraising Concert taking place on October 20th noting that all Members are invited to help support the Kangaroos Disability Clubs charity.

7. SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT - ADOPTION.

Councillor Salisbury moved the item noting that at District Plan examination, the Inspector raised the housing numbers significantly and allowed the Council time to incorporate it into the District Plan through the Site Allocations Development Plan Document (Site Allocations DPD). He noted that the document provides greater certainty for the Council's five-year housing land supply and although he acknowledged there are concerns, the Inspector found the sites to be sound, and each will still have to go through the formal planning application process before

proceeding. He highlighted the difference between this document and the District Plan. He also noted that the Site Allocations DPD is a binary decision for Council to agree or reject. If rejected it could result in a worst-case scenario for the Council with no five-year housing land supply and sites being put forward by developers on an ad hoc basis with limited scope for the Council to refuse. This was seconded by Councillor Ash-Edwards.

Councillor Eggleston proposed an amendment to the recommendations due to the sensitivities around sites SA12 and SA13 on ecological, strategic and traffic grounds. The amendment also takes into consideration a letter sent to the Secretary of State from the Member of Parliament for Mid Sussex. This was seconded by Councillor Alison Bennett who highlighted the need for perception that the political and democratic process has been sound in this decision making. At her request, clarification was also provided by the Head of Regulatory Services that if the Council agreed a deferral was possible. He noted that if the document was agreed, the Secretary of State has call-in powers, and it could be open to Judicial Review, but it will have been approved by this Council.

The amendment is as follows:

To delete items 1-3 and replace with 'Defer the adoption of the Site Allocations DPD to allow the Secretary of State for Levelling Up, Housing and Communities to reconsider the inclusion of SA12 and SA13 in the plan document as requested by the Member of Parliament for Mid Sussex on 29 June 2022.'

Members discussed the reasons for delaying the adoption of the document, and the potential impacts this may have. A number of Members raised concern over the decisions taken by the cross-party working group in choosing the sites to be included and the lack of opportunity for some Members to revisit those decisions. Those Members felt that the process and the document was therefore flawed and needed a pause to reconsider the options available. Issues relating to biodiversity net gain were also raised as were issues relating to housing oversupply and infrastructure pressures.

Several Members countered by noting that the requirement for extra housing was determined by the Inspector and the proposals now being considered had been through a cross party working group and two public consultations resulting in it being found to be sound in the Inspector's final conclusions. It was noted that if the amendment to defer was agreed, it would have an impact on proposed employment sites such as the Science Park which would lead to a negative economic impact on the District. The Council would also not meet its housing requirement in full, and a lack of a five-year housing land supply would open the possibility of speculative development. This could still result in sites SA12 and SA13 being put forward with an inability to defend them at the planning application stage, as developers could argue that the Inspector's comments are a material consideration.

With regards to pausing the process until the letter sent by the Member of Parliament for Mid Sussex had been considered, it was noted that the Council could proceed to adopt the document and then amend in light of any decision made by the Secretary of State. It was also noted that the Inspector was chosen by the Secretary of State and therefore the request to review his findings could place the Secretary of State in a difficult position. A Member cited the Inspector's conclusion at paragraph 328 of the report as he notes 'there are no soundness issues in relation to development management, uncertainties or risk and the plan is therefore sound in relation to these

aspects.’ It also complies with all relevant legal requirements and issues around the Local Development Scheme.

The Chairman took Members to a vote on the proposed amendment. 18 Members voted in favour, 25 against and there were no abstentions. Consequently, the amendment to defer was lost.

Members discussed the substantive recommendations noting the extensive work that has gone into reaching this position. Ecological issues with sites SA12 and SA13 were further discussed, including requirements around environmental impact assessments. Several Members were unable to support the recommendations whilst specific greenfield sites such as SA12 and SA13 were included.

Discussion was also held on the provision of adequate infrastructure to meet the needs of the new housing and employment sites. Members acknowledged that some areas do face issues such as traffic congestion but noted that no sites were listed as a major concern by the Inspector. It is also possible for mitigations and infrastructure improvements to be put in place.

In conclusion, seconding the original motion Councillor Ash-Edwards acknowledged that planning is the most difficult issue for Local Authorities to undertake and although there are often disagreements, the Council has to work to assist the whole District. He highlighted that if the document is not adopted, the Council will lose control of development within the District, as it will not be possible to rely on the policies and mitigations contained in the Sites Allocation DPD. He thanked past portfolio holders and the current Cabinet Member for their work in bringing the document to this point. He also acknowledged the concerns of Members who raised specific issues in their towns and wards, particularly noting the need to cooperate with the West Sussex Highways Authority with regards to East Grinstead and reassured Members that this collaborative working was part of policy requirements (and therefore protection) provided for within the document. He noted that there is a need to provide housing and that no alternative sites have been put forward during the process to replace the ones that have been disagreed with and reiterated that the Inspector has concluded that the plan is sound.

The Chairman took Members to a vote on the recommendations as contained in the report. A recorded vote was taken and the recommendation was approved with 24 in favour, 18 against and there was 1 abstention.

	For	Against	Abstain		For	Against	Abstain
Ash-Edwards, J.	✓			Henwood, J.		✓	
Bates, R.		✓		Hicks, S.		✓	
Belsey, J.	✓			Hillier, S.	✓		
Belsey, M.	✓			Hussain, T		✓	
Bennett, A.		✓		Jackson, R.		✓	
Bennett, L.	✓			Knight, J.	✓		
Bradbury, P	✓			Laband, C	✓		
Brown, P.		✓		Lea, Anthea	✓		
Cartwright, R.		✓		Llewellyn-Burke	✓		
Chapman, P.		✓		Marsh, G	✓		
Clarke, R.	✓			Phillips, C.		✓	
Coote, P.	✓			Pulfer, M.	✓		

Cornish, M.		✓		Salisbury, R	✓		
Dabell, J.	✓			Sparasci, A.		✓	
Dempsey, B		✓		Stockwell, L	✓		
de Mierre, R.	✓			Sweatman, D.	✓		
Ellis, S	✓			Trumble, C.	✓		
Eggleston, R.		✓		Walker, N	✓		
Eves, A.		✓		Webster, N.	✓		
Forbes, B.	✓			Whittaker, R.			✓
Gibbs, L.		✓					
Gibson, I.		✓					
Hatton, S		✓					

RESOLVED

Council agreed to:

- (i) Adopt the Site Allocations Development Plan Document;
- (ii) Publish the Site Allocations Development Plan Document, Sustainability Appraisal Report and the Adoption Statement;
- (iii) Give delegated authority to the Divisional Unit Leader for Planning and Economy, to make typographical and minor factual corrections to the documentation as necessary before publication.

8. REPRESENTATIVES ON OUTSIDE BODIES.

Councillor Ash-Edwards moved the item asking Members to vote on the recommendations as per column 1 of the report. This was seconded by Councillor Webster.

The Chairman took Members to a vote on the recommendations as contained in the report which was approved with 39 in favour and 3 abstentions.

RESOLVED

Council approved the nominations to outside bodies listed in paragraph 4 of this report.

9. ADOPTION OF MODERN SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT.

Councillor Anthea Lea moved the item noting that in October 2020 the Council undertook to be a slavery free community and remove slave-based labour from its supply chains. In March 2022 the Scrutiny Committee reviewed the statement and unanimously agreed it. The item was seconded by Councillor Webster who thanked the Scrutiny Committee for the way in which they debated and supported it.

The Chairman took Members to a vote on the recommendation as contained in the report which was approved unanimously.

RESOLVED

Council adopted the attached draft Modern Slavery and Human Trafficking Transparency Statement for 2022/2023.

10. MSDC PAY POLICY STATEMENT 2022/23.

Councillor Ash-Edwards moved the item noting it is an annual report. This was seconded by Councillor de Mierre who noted that it was a requirement of the Localism Act 2011 and reflects current practice.

A Member asked whether any payment above £100k was to be referred to Council and sought clarity on whether that includes all exit payments for a post holder. The Leader explained that recent Government Guidance clarified the existing legal position. The Guidance defined clearly what constituted 'special severance payments' and what the recommended governance was for such payments. He also confirmed that payments required contractually or under enactments did not constitute 'special severance' and did not count towards the £100k threshold. Special Severance were largely discretionary payments .

The member suggested the Council could chose to adopt a £100k threshold regardless and the Leader advised that the Council should instead continue to follow legal requirements.

The Chairman took Members to a vote on the recommendations as contained in the report which was approved with 35 in favour and 8 against.

RESOLVED

Council agreed the Pay Policy at Appendix A, to comply with the requirements of the Localism Act.

11. SCRUTINY COMMITTEE RESPONSIBILITIES FOR 2022/23.

Councillor Webster moved the item noting that the changes reflect the agreed portfolio changes as reflected in the constitution. This was seconded by Councillor Ash-Edwards.

Discussion was held on items such as sport and leisure which are now split between two committees. It was noted that Members could attend other Scrutiny Committees if the wish. A Member requested that the Scrutiny Committee for Planning, Economic Growth and Net Zero should meet as planned and the working group with regards to the District Plan should proceed. In response to a question on the subject, Councillor Webster confirmed that the recent Governance Review was taken into consideration when the changes to these committees were considered.

The Chairman took Members to a vote on the recommendations as contained in the report which was approved with 39 in favour, 2 against and 2 abstentions.

RESOLVED

The Council agreed:

- (i) Three Scrutiny Committees entitled (1) Scrutiny Committee for Leader, Deputy Leader and Housing and Customer Services dealing with the work

carried out by the Leader, Deputy Leader and Cabinet Member for Housing and Customer Services,(2) Scrutiny Committee for Planning, Economic Growth and Net Zero to shadow the work of the Cabinet Member for Planning and the Cabinet Member for Economic Growth and Net Zero and (3) the Scrutiny Committee for Community, Leisure and Parking to shadow the work of the Cabinet Member for Community and the Cabinet Member for Leisure and Parking.

- (ii) The three Committees will meet at 7 pm in the Council Chamber unless otherwise agreed by the relevant Committee Chairman.

12. RECOMMENDATIONS FROM CABINET HELD ON 6 JUNE 2022.

Councillor Ash-Edwards moved the item. This was seconded by Councillor John Belsey who highlighted the three additional projects added to the Capital Programme including works to bring temporary accommodation to East Grinstead at Swan Mead, works to Bedelands and work to finalise arrangements to the toilets at the Orchards Shopping Centre.

The Chairman took Members to a vote on the recommendations on both items as contained in the report which was agreed with 42 in favour and 1 abstention.

RESOLVED

FINANCIAL OUTTURN 2021/22

Council approved:

- (i) that grant income as set out in paragraph 12 to 25 of the Cabinet report be transferred to Specific Reserves;
- (ii) that requests totalling £82,000 be transferred to Specific Reserves as set out in Table 1 of the Cabinet report;
- (iii) that balance of interest totalling £174,111 as set out in paragraph 27 of the Cabinet report is transferred to the General Reserve;
- (iv) that the shortfall in Dividend income totalling £19,232 as set out in paragraph 31 of the Cabinet report is met from the General Reserve;
- (v) that the 2022/23 capital programme be increased by £5,215,000 as a result of slippage of some 2021/22 capital projects as detailed in Table 2 of the Cabinet report;
- (vi) that the revenue underspend in 2021/22, totalling £144,000, be transferred to General Reserve.

CAPITAL PROGRAMME AND REVENUE PROJECTS UPDATE

Council approved:

- (i) the variations to the Capital Programme and Revenue Projects 2022/23 contained in paragraph 17 of the Cabinet report in accordance with the Council's Financial Procedure rule B3.

13. TO RECEIVE THE LEADER'S REPORT.

The Leader confirmed that the interim report on the Clair Hall site will be reported to Cabinet in July to set out work carried out by the Steering Group. A report will also be

published that outlines the significant challenges of the existing building. In response to a question on when it will be presented to a Scrutiny Committee, he reiterated that it will be presented to Cabinet in July.

The Leader also confirmed that the Council continues to receive positive feedback from the Government regarding the Levelling Up Fund for Burgess Hill and is preparing for submitting a bid in round two. More details will follow in due course.

In response to a question from a Member regarding standards, the Leader noted that Councillors have an obligation to set a good example in their role.

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

Deputy Leader

The Deputy Leader noted that work continues to progress the food waste trial and participating residents will be written to in July and Members will have a briefing on the subject, with further comms being issued soon after. He confirmed that it will be a '3-2-1 trial' with food collected weekly, recycling collected fortnightly, and the residual waste collected every 3 weeks. The food waste will be taken to Basingstoke to be bio digested. Further composition analysis and benchmarking will also take place and the Council is continuing to push important alternatives such as home composting and alternative plastic recycling. In terms of garden waste, the Council is nearing 23000 users which is the current capacity so ways to expand this are being investigated.

Cabinet Member for Economic Growth and Net Zero

The Cabinet Member provided feedback from his attendance at the West Sussex Joint Climate Change Board Meeting where key items being discussed included an update on how West Sussex Local Authorities are proceeding towards the decarbonisation of their estates, and how we can work together on carbon off-setting and sequestration. He reported that Mid Sussex will be looking to our prospective refreshed District Plan to feature new and enhanced policies in this area. During the meeting he also suggested that work was needed to look at what reasonable measures we all should be taking to make our areas more resilient to climate change. For example, flooding, water resilience, increased temperatures affecting homes and workplaces and energy consumption, and its impact upon our species. In response to a Member's request to work with the South Downs National Park Authority (SDNPA), he confirmed that SDNPA is part of the West Sussex Joint Climate Change Board.

Regarding the Burgess Hill Growth Area, he confirmed that the Green Circle is 99% done and the Green Links are 97% done, both due to complete this month and reflecting a huge investment into Burgess Hill and partnership working with West Sussex and Homes England resulting in a superb network of cycling and walking pathways around and into the town. West Sussex are now about to commence their large projects to enhance the linkages and sustainable transport experience around some of the town centre. He acknowledged a Member's concern that there will be disruption in Burgess Hill when the roads are dug up for the place and connectivity programme and noted comments that West Sussex County Council needed to be better at the communication around this disruption. However, he noted the long-term gain to be had from the works.

In relation to the Economy, he confirmed that the Micro Business Grant scheme is open for bids and urged Members to promote them to local businesses. He also noted that the Council supported the Burgess Hill Business Park Association's STEM week with local schools and will be supporting the forthcoming Haywards Heath STEM challenge.

Cabinet Member for Leisure and Parking

The Cabinet Member noted that the three leisure centres are increasing their membership and the number of visits continues to rise. It is now around 70% of pre covid levels and in a good position to achieve the target of 400000 visitors and 11000 members in this fiscal year. She confirmed that there is a revised management income of £600,000 in this fiscal year and Officers are negotiating the management income for the next financial year. Places Leisure have also identified a number of decarbonisation projects which subject to funding being available they would like to progress.

Regarding parking service data, this is 21% up on last year's figures. Season tickets also saw an increase but remain at 43% compared to the pre covid period.

Regarding the first phase of the electric vehicle charging point project with West Sussex, phase one is nearly complete. 66 charging points have been installed in Council car parks and Connected Curb are preparing a list of potentially viable other locations, with plans to install some in disabled bays as well.

In response to a question on enforcement when petrol/diesel cars park in the charging spaces, the Cabinet Member noted that enforcement takes place in the same way as for other bad parking. She agreed to provide further information on when patrols could take place in the Hurstpierpoint Trinity Road car park. She also agreed to respond in writing to Members on the current position with the charging point in Cyprus Road which is not currently working.

The Chairman took Members to a vote on whether to extend the meeting past 10pm which was lost with 15 in favour, 26 against and 1 abstention.

Cabinet Member for Community

The Cabinet Member reminded Members of a programme of free play days across the District during the summer. He reminded Councillors of the new Integrated Care System (ICS) coming into place on 1 July to replace the Clinical Commissioning Groups in Mid Sussex. The ICS is beginning engagement exercises across Mid Sussex from Friday 1 July.

He also was pleased to note the Armed Forces commemorative events held recently across the district, as well as the many Platinum Jubilee celebrations.

Cabinet Member for Planning

The Cabinet Member noted that training sessions have run for Planning Committee Members. The session on Planning Enforcement was open to all Members and slides from this session will be circulated to Members.

15. QUESTIONS FROM MEMBERS PURSUANT TO COUNCIL PROCEDURE RULE 10.2.

Two questions received were withdrawn by the Member who posed them.

The meeting finished at 9.57 pm

Chairman

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SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

REPORT OF: Judy Holmes, Deputy Chief Executive
Contact Officer: Sally Blomfield – Assistant Director, Planning and Sustainable Economy
Email: Sally.Blomfield@midsussex.gov.uk Tel: 01444 477435
Wards Affected: All
Key Decision: Yes
Report to: Council
10 August 2022

Purpose of Report

1. The purpose of this report is to request that the Council reaffirm its decision, taken at the Council meeting on 29 June 2022, to adopt the Site Allocations Development Plan Document (Sites DPD) expressly in the light of their consideration of all the Sustainability Appraisal (SA) work undertaken to support the Sites DPD, and the consultation responses thereto. We are not seeking to readopt the Sites DPD.

Summary

2. The Inspector's Report on the Examination of the Sites DPD was received on 30 May 2022. The Inspector's Report concluded that the Sites DPD, when incorporating Main Modifications suggested by the Inspector, is legally compliant, sound and capable of adoption.
3. At the meeting on 29 June 2022 the Council resolved to adopt the Sites DPD. The full Report to that meeting is attached as Appendix A.
4. On 18 July 2022 the Council received a Letter before Claim from Cllr Robert Eggleston (see Appendix B), in his personal capacity and as a member of South of Folders Lane Action Group (SOFLAG) challenging the Council's decision on the basis that there was an error of law in that Members were not expressly directed to consider the final SA and consultation responses to it. The Claim has been made notwithstanding that:
 - the Regulation 19 SA was considered by the Full Council in June 2020, when it was resolved to publish the draft Sites DPD and the SA for consultation, and submit the DPD to the Secretary of State for examination;
 - the Regulation 19 SA was subsequently updated to reflect the Main Modifications recommended by the Inspector, and although the SA Addendum was consulted upon, there were no further comments received;
 - the Regulation 19 SA, the consultation responses to it and the SA Addendum were available on the Council's website at all times prior to the meeting;
 - an electronic link to the evidence base, including these documents, was made in the Council Report;
 - the SA was expressly referred to in the Recommendations to the Council;
 - the SA documentation was highlighted in the section of the Report which set out 'Sustainability Implications' of the matter before the Council (Paragraph 48); and

- the Inspector’s full Report (which was appended to the Council Report in full) expressly dealt with the SA;
 - the Inspector’s conclusions, that the SA meets all legal requirements, were set out in the Council Report (Paragraph 20); and
 - the Final SA as published in accordance with the Council’s decision on 29 June 2022 simply combined the Reg 19 SA with the SA Addendum, with no other substantive change to the content of either.
5. Although Leading Counsel (acting on behalf of the Council) considers it clear that Members were being asked to adopt the Sites DPD in the light of the SA and the consultation responses, as recommended by the Inspector, and that they were either familiar with or had access to all the relevant documents, he has advised that, in order to avoid unnecessary expense to the taxpayers and to expedite procedures should the matter be taken further by the Claimant, the Council be directed to read all the documents and in particular the SA and, in the light of the final SA and consultation responses, requested to reaffirm its decision to adopt the Plan.

Recommendation

6. Council is recommended to reaffirm the decision to adopt the Site Allocations Development Plan Document (the Sites DPD) taken on 29 June 2022 expressly in the light of the Sustainability Appraisal work (including consultation responses) undertaken to support the preparation of the Sites DPD.

Background

7. The Council commenced preparation of Site Allocations Development Plan Document (the Sites DPD) in 2018.
8. Following consideration of the Sites DPD by the Scrutiny Committee for Housing and Planning at its meeting on 11 September 2019, the Council agreed to approve the Regulation 18 draft of the Sites DPD for public consultation and agreed to the publication of the Sustainability Appraisal (SA) also for public consultation at its meeting 25 September 2019. The report to Council explained the role of the SA and how it had informed decisions related to the strategy and selection of sites. The appendices to both Reports contained a non-technical summary of the SA, and the full SA Report was listed as a background paper.
9. Following consideration of the Sites DPD by the Scrutiny Committee for Housing and Planning at its meeting on 11th March 2020, the Council approved the submission of the Regulation 19 draft Sites DPD and supporting documentation (which included the SA) for consultation, and subsequent submission to the Secretary of State for examination at its meeting on 22 July 2020. Again, a non-technical summary of the SA was appended to the Report, and the main SA Report was listed as a background paper.
10. The Consultation responses to Regulation 19 Draft and supporting documentation were published in full on the Council’s webpages. A summary of the consultation responses to the supporting documentation was also published on the Council’s webpages and is attached as Appendix C for completeness.
11. The Sites DPD, along with all associated supporting material, was submitted to the Secretary of State on 16 December 2020 for examination.

12. Throughout the examination, the Inspector explored the potential for Main Modifications to resolve any soundness issues identified. The Inspector set out 22 Main Modifications which he felt were required to ensure the Sites DPD could be found 'sound'. The Main Modifications were subject to an SA process. The only substantive changes to the SA between 22 July 2020 and 29 June 2022 related to the proposed Main Modifications to the Sites DPD. The SA Addendum is appended to this Report at Appendix D.
13. The Main Modifications and the SA Addendum were subject to consultation between November 2021 and January 2022. Although c.300 responses were received to the Main Modifications there were no responses to the SA Addendum.
14. The Sites DPD and accompanying evidence base, the Main Modifications, the SA Addendum and consultation responses were all considered by the Inspector in the course of his examination of the plan. The Inspector submitted his report to the Council on 30 May 2022. The Inspector's Report was attached in full to the Council Report of 29 June 2022 (which is appended in full to this report at Appendix A).
15. The Inspector concluded that, with the recommended Main Modifications, the Sites DPD satisfies the requirements referred to in Section 20(5)(a) of the Planning and Compulsory Purchase Act 2004 and is sound and capable of adoption.
16. At its meeting on 29 June 2022 the Council was asked to consider a report on the adoption of the Sites DPD (attached as Appendix A) and, following consideration of the report, Members resolved to:
 - (i) Adopt the Site Allocations DPD;
 - (ii) Publish the Site Allocations DPD, Sustainability Appraisal Report and the Adoption Statement;
 - (iii) Give delegated authority to the Divisional Unit Leader for Planning and Economy, to make typographical and minor factual corrections to the documentation as necessary before publication.
17. Following the Council resolution, the relevant documents were made available in accordance with Regulations 26 and 35 which included publishing them on the Council webpages. This included the SA Report (noting the Regulation 19 and Main Modifications Addendum versions of the SA were already published on this page). The Final SA (which amalgamates the Reg 19 SA with the SA Addendum) can be found attached at Appendix E.

Issues

18. The Letter before Claim states that the decision to adopt the Sites DPD was:
 - (i) In breach of the obligation at Regulation 8(2) Environmental Assessment of Plans and Programmes Regulations (SI 2004/1633), the Council adopted the DPD without taking account of the environmental report [i.e. the SA] prepared under those regulations or the opinions expressed in response to that report.
 - (ii) The report to the Council on 29 June 2022 did not append a copy of environmental report or consultation responses received in connection with the July 2020 version of the report or the addendum report dated November 2021, nor did it contain a summary of its contents or the consultation responses which had been received.

- (iii) The report did not list the environmental report and consultation responses expressly as “background papers”. The report simply explained that the “full evidence base, examination library and examination documents” were available via a link on p.23 of the Council Report. At the time of the meeting, that link (www.midsussex.gov.uk/SitesDPD) did not go through to a webpage including the final environmental report and consultation responses. The final environmental report was only uploaded to that page on 7 July 2022.
19. The Letter before Claim goes onto state that “members are not to be taken to have considered a background document unless they are expressly told to read it”.
20. The Letter before Claim suggests that the most appropriate remedy to the Court “would be an order quashing the decision of the Council to adopt the DPD on 29 June 2022 and an order remitting the DPD to Full Council to reconsider the question of adoption, ensuring that the necessary information prescribed at Regulation 8(3) of the 2004 Regulations was before members”.
21. The Council’s QC confirms that should this matter proceed to Court and should the Court conclude that there was an error of law, the Court would have a range of remedies available to it. The same issue arose in ***Flaxby Park Ltd v. Harrogate Borough Council* [2020] EWHC 3204 (Admin)**, where Holgate J ordered that, since there had been no error up to and including the conclusion of the examination process, it would not be appropriate to quash the plan (which would require the Council to go back to the beginning of the process) but instead that the whole of the Plan should be remitted to the Council for it to consider the SEA/SA material (including the consultation responses). In short, the order he made was limited to requiring the Council to correct the error which he had identified.
22. In the circumstances, officers have considered how best to remedy the situation. Clearly, it is in everyone’s interests that we arrive at a solution as quickly as possible, and in a way which does not involve unnecessary expense. Therefore, given the approach taken by Holgate J in the Flaxby case, Officers are bringing the issue back to Council in order that the Council can reaffirm its decision to adopt the Sites DPD having been directed expressly to look at the SA material (including consultation responses).
23. The Letter before Claim suggests that, because the Council has already decided to adopt the Sites DPD, it has no power to revisit that question unless and until a Court has formally ordered it to do so. However, the present recommendation is not that the Council should adopt the Sites DPD, but that it should reaffirm its decision to do so, in the light of the SA material and the consultation responses. If the recommendation is accepted, it would address the substance of the concern identified by Councillor Eggleston in the Letter before Claim. If, despite this, a claim is still brought (and should the Court find there was some error in the decision of 29 June 2022) a decision in accordance with the recommendation would provide a clear basis for the Council to argue that there would be nothing to be gained by the Court ordering the matter to be remitted for reconsideration.

Importance and Status of the Sites DPD

24. The purpose of the Sites DPD is to demonstrate that Mid Sussex can meet its housing and employment needs in full (as required by the District Plan) and to secure the five-year housing land supply to avoid speculative, unplanned development. It allows the Council to set policy criteria and mitigation and provides developers, infrastructure providers, and the community certainty about future growth. The Sites DPD achieves these aims.
25. The adopted Sites DPD enables the Council to demonstrate it is meeting its current housing requirement in full. In the absence of an adopted Plan the five-year housing land supply position would be at risk and would lead to speculative, unplanned development across the whole District.
26. Notwithstanding whether the Claimant issues proceedings the Council can and will still continue to give significant weight to the Policies of the Sites DPD in the determination of planning applications, in accordance with the advice in para 48 of the NPPF.

Policy Context

27. The preparation and adoption of the Site Allocations DPD is important in that it ensures that development is properly planned through a democratic, open and transparent process; that local housing and employment needs will be met over the Plan period; that the best environmental outcomes are secured; that all necessary infrastructure required to support development is secured.
28. The adoption of the Sites DPD therefore aligns with the Council's priorities for Sustainable Economic Growth **and** Strong and Resilient Communities.

Other Options Considered

29. There are no reasonable alternative Options to the approach put forward in the recommendation to this report.

Financial Implications

30. There are significant cost implications for the Council if a Claim is progressed through to the High Court. In order to avoid unnecessary additional expense to the taxpayers purse, and in view of the legal decision in Flaxby, it is clear that the best approach is for the Council is to reaffirm its adoption of the Sites DPD in the light of the SA work undertaken to support the Plan.

Risk Management Implications

31. The approach set out in this Report seeks to mitigate any risks to the adoption of the Sites DPD if the Claimant seeks to issue proceedings.

Equality and Customer Service Implications

32. An Equality Impact Assessment was prepared and published at all stages alongside the Sites DPD, to ensure opportunities to promote equality and/or barriers to service are considered and addressed. This position has not changed.

Other Material Implications

33. There are no other material considerations.

Sustainability Implications

34. The sustainability implications of the Sites DPD were tested at each stage of Plan making. The Inspector in his Report stated that “*no adverse effects are identified in the SA that cannot be effectively mitigated*” (Paragraph 28).

Appendices

Appendix A: Council Report on the Adoption of the Site Allocations DPD dated 29 June 2022

Appendix B: Letter before Claim

Appendix C: Regulation 22 (1) (c) Statement of Consultation Appendix 10 Summary of Responses (Reg 19) – Evidence Base and Policies Map (December 2020)

Appendix D: The SA Addendum

Appendix E: The Final SA (which amalgamates the Reg 19 SA with the SA Addendum)

Background Papers

Members’ attention is specifically drawn to the full set of consultation responses submitted to the Regulation 19 Consultation, including to the SA, which can be found here:

<https://www.midsussex.gov.uk/planning-building/development-plan-documents/site-allocations-dpd-evidence-library>

https://www.midsussex.gov.uk/media/5842/sustainability-appraisal_redacted.pdf

(Please note that the Summary of these Responses to the Evidence base, including to the SA, is attached as Appendix C to this Report)

Members’ attention is also drawn specifically to the responses received to the Main Modifications which can be found here:

<https://www.midsussex.gov.uk/planning-building/development-plan-documents/site-allocations-dpd-examination/#topic-main-modification-responses>

The adopted Policies Map and proposed changes as a result of the Sites DPD are available online at:

<https://www.midsussex.gov.uk/planning-building/policies-maps/>

The full evidence base, examination library and examination documents are available online at www.midsussex.gov.uk/SitesDPD

Appendix A

SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT - ADOPTION

REPORT OF: Judy Holmes, Assistant Chief Executive
Contact Officer: Sally Blomfield – Divisional Unit Leader for Planning and Economy
Email: Sally.Blomfield@midsussex.gov.uk Tel: 01444 477435
Wards Affected: All
Key Decision: Yes
Report to: Council
29th June 2022

Purpose of Report

1. The purpose of this report is to recommend Council adopt the Site Allocations Development Plan Document (the 'Sites DPD') in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Summary

2. This report provides a summary of the content of the Sites DPD, the key issues raised in the Inspector's Report and sets out the next steps in the formal process of adopting the Sites DPD.
3. The Report on the Examination of the Sites DPD was received on 30th May 2022. The Inspector's Report concluded that the Sites DPD, when incorporating Main Modifications suggested by the Inspector, is legally compliant, sound and capable of adoption.

Recommendations

4. **Council is recommended to:**
 - (i) **Adopt the Site Allocations Development Plan Document;**
 - (ii) **Publish the Site Allocations Development Plan Document, Sustainability Appraisal Report and the Adoption Statement;**
 - (iii) **Give delegated authority to the Divisional Unit Leader for Planning and Economy, to make typographical and minor factual corrections to the documentation as necessary before publication.**
-

Background

5. The Mid Sussex District Plan 2014-2031, adopted in March 2018, commits the Council to the preparation of a Site Allocations Development Plan Document (the 'Sites DPD') to ensure that housing and employment needs for the district are met in full.
6. The Council commenced preparation of the Sites DPD in 2018. There were two formal rounds of consultation (October/November 2019 and August/September 2020), allowing all stakeholders to submit their views.
7. The Sites DPD contained:
 - 22 housing sites
 - 7 employment sites
 - a Science and Technology Park to the west of Burgess Hill

- additional policies to support delivery of the allocations and promote sustainable development
8. At its meeting on 22nd July 2020, Council agreed to submit the draft Sites DPD and supporting documentation to the Secretary of State for examination. The Sites DPD was submitted to the Secretary of State on 16th December 2020.

Examination of the Sites DPD

9. The examination process for the Sites DPD commenced at the point of submission to the Secretary of State. An independent Inspector was appointed by the Planning Inspectorate to assess compliance with all legal requirements and whether the plan is 'sound' by reference to the tests of soundness within the National Planning Policy Framework (NPPF).
10. The examination consists of the Inspector's consideration of written material and oral participation at hearing sessions.
11. The Inspector provided his initial questions for the Council in March 2021. Following this, the Inspector published his "Matters, Issues and Questions" in April 2021 and invited statements from all interested parties. The Matters, Issues and Questions formed the basis for the examination hearing sessions.
12. There were 10 hearing sessions which commenced on 1st June 2021 and concluded on 16th June 2021.
13. The Sites DPD and accompanying evidence base has been thoroughly scrutinised by the Inspector, to allow him to draw conclusions in his report.
14. The examination hearings involved 50 invited participants and covered legal requirements, the housing requirement and provision, examination of each of the proposed site allocations, environmental policies, constraints and designations, transport and infrastructure and Development Management issues.

Post-Hearing Actions and Main Modifications

15. During the hearing sessions, the Inspector set 22 "Post-Hearing Actions" for participants. These included requests for additional statements and clarifications on issues and matters that arose during the hearing sessions. The Inspector allowed participants the opportunity to respond (in writing) to any additional statements prepared.
16. Throughout the examination, the Inspector explored the potential for Main Modifications to resolve any soundness issues identified. The Inspector set out 22 Main Modifications which he felt were required in order to ensure the Sites DPD could be found 'sound'. The Main Modifications (Appendix B) were subject to consultation between November 2021 and January 2022; approximately 300 responses were received and submitted to the Inspector to inform his final report.

Inspector's Report Conclusions

17. Following consideration of all submitted material the Inspector submitted his report to the Council on 30th May 2022. The Inspector's Report is at Appendix A.

18. The Inspector concludes that, with the recommended Main Modifications, the Mid Sussex Sites DPD satisfies the requirements referred to in Section 20(5)(a) of the Planning and Compulsory Purchase Act 2004 and is sound and capable of adoption. The following paragraphs 19 - 34 of this report set out the key findings.

Legal Compliance

19. The Inspector concludes that the Council has engaged constructively, actively and on an on-going basis and that the duty to co-operate has been met (paragraph 19).
20. The Plan is legally required to be accompanied by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), which should be used to inform the plan-making process. The Inspector concludes that the SA and HRA meet the requirements (paragraph 34).
21. The Inspector concludes that all consultation was carried out in accordance with the Council's adopted Statement of Community Involvement (SCI) and is therefore legally compliant in that regard (paragraph 329).
22. Overall, the Inspector concludes that the Sites DPD is compliant with all legal requirements (paragraph 329).

Housing Provision

23. The Inspector concludes that:
- The spatial distribution of sites within the Sites DPD is in general conformity with the adopted District Plan Strategy, and is therefore sound (paragraphs 70 – 76, 78)
 - Adequate allowance (i.e. over-supply, for contingency) has been included in the plan (paragraph 80)
 - The Council's calculation is a land supply figure of 5.59 years. Following the Inspector's detailed examination of evidence, the Council can demonstrate to a reasonable degree of certainty a 5-year housing land supply (paragraph 84)
 - The Council's allowance for windfall development is a conservative estimate, which is highly likely to be exceeded, but is realistic (paragraph 89).
 - An additional policy should be included to provide for specialist accommodation for Older People and Care Homes, supporting proposals that contribute to meeting this need subject to criteria being met (paragraph 100 – 103).

Housing Sites

24. The Inspector sets out his conclusions on each proposed housing site (paragraphs 107 – 218). The report sets out the various matters raised by participants, and the Inspector's assessment of the evidence submitted.
25. Overall, the Inspector concludes that the proposed housing site allocations are justified and deliverable (paragraph 218). The Inspector has not recommended removal of any of the submitted sites, nor has he recommended that any additional sites are included.
26. The Inspector has, however, recommended reducing the yield of SA25: Land to the west of Selsfield Road, Ardingly, from 70 dwellings to 35 dwellings. This Main Modification was required to be consistent with national policy in relation to the site's potential impact on the High Weald Area of Outstanding Natural Beauty.

27. The District Plan housing requirement (2014 – 2031) is a total of 16,390 dwellings. The Sites DPD proposes allocations totalling 1,704 dwellings. When combined with sites already completed, sites with planning permission, District Plan allocations, Neighbourhood Plan allocations and windfall, the total supply for the plan period is 17,297. This is an over-supply of 907 (a buffer of 5.5%), which the Inspector has confirmed is a reasonable amount of flexibility.

Environment, Landscape, Biodiversity and Heritage

28. The Inspector concludes that the Plan's provisions for the protection and enhancement of the environment, including landscape, biodiversity and heritage aspects are justified, effective and consistent with national policy (paragraph 238). This includes detailed consideration of the effectiveness of Suitable Alternative Natural Greenspace (SANG) to reduce the likelihood of harmful visitor pressure on Ashdown Forest.

Employment Need and Site Allocations, including the Science and Technology Park

29. The Inspector sets out his conclusions on each proposed employment site individually (paragraphs 239 – 264).
30. A broad location for a Science and Technology Park to the west of Burgess Hill, capable of accommodating at least 2,500 jobs, was identified in the adopted District Plan. The Sites DPD sets out the precise location and sets development criteria and transport mitigation. The Inspector concludes that the scale and location for the Science and Technology Park is justified and in conformity with the District Plan (paragraph 262).
31. The Council identified an employment need of 10-15ha. The Sites DPD contains 7 employment allocations totalling 17.45ha. The Inspector has concluded that the proposed employment site allocations are sound.

Infrastructure and Transport

32. The impact of the Sites DPD on the transport network was subject to significant examination. Transport was discussed in detail in relation to sites SA12 and SA13 (Burgess Hill) and SA19 and SA20 (East Grinstead) as well as at a dedicated hearing session related to transport matters. The Inspector sets out his detailed conclusions on these matters in paragraphs 278 – 309). In summary:
- The Mid Sussex Transport Model and the modelling carried out by the Council's highways consultant (Systra) is fit for purpose (paragraph 288)
 - Whilst there are existing transport issues in Burgess Hill, the Inspector considers the town will experience an overall improvement in traffic impact following implementation of the Plan subject to the delivery of planned sustainable transport measures and highways improvements. (paragraph 300)
 - The Mid Sussex Transport Study is supported by other more detailed traffic studies for the proposed sites in East Grinstead and that proposed interventions would mitigate the impact of the allocations and provide a strategic betterment (paragraph 305)

Overall Conclusion and Recommendation

33. The Inspector was requested by the Council to recommend Main Modifications to the Plan to make it sound and capable of adoption. As described in paragraph 16 of this report, the Inspector recommended Main Modifications which were subject to consultation.
34. The Inspector concludes that the duty to co-operate has been met and with the Main Modifications, the Sites DPD is sound and capable of adoption (paragraph 331).

Site Allocations DPD – Adoption

35. The Council resolved to submit a Sites DPD in July 2020. Given the Inspector’s conclusions, the final stage of the process is to adopt the Sites DPD. Once adopted, it will form part of the Development Plan for Mid Sussex and will be afforded full weight in determining planning applications.
36. The Planning and Compulsory Purchase Act (2004) is very clear that an authority may adopt the document “as it is” or, where required by an Inspector, with “main modifications”. The Act goes on to state that authorities can only adopt a Plan where it meets either of these criteria. This means the Council does not have the option to remove policies or only adopt elements of the Plan. Therefore, at this stage the Council can either:
 - Adopt the Sites DPD incorporating the Inspector’s Main Modifications; or
 - Not adopt the Sites DPD
37. Planning Practice Guidance (ID 61-058-20190315) states:

“While the local planning authority is not legally required to adopt its local plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.”
38. The purpose of the Sites DPD is to demonstrate that Mid Sussex can meet its housing and employment needs in full (as required by the District Plan) and to secure the five-year housing land supply to avoid speculative, unplanned development. It allows the Council to set policy criteria and mitigation and provides developers, infrastructure providers, and the community certainty about future growth. Adopting the Sites DPD achieves these aims.
39. If the Council does not adopt the DPD, it will not be able to demonstrate it is meeting its current housing requirement in full, which would put the five-year housing land supply position at imminent risk and lead to speculative, unplanned development.
40. If the Sites DPD were not adopted, given the favourable findings of the evidence base and conclusions of the Inspector, it is likely that the promoters of the sites within the DPD would submit planning applications in any event. The site-specific requirements for infrastructure and mitigation set out in each site policy could only be enforced with an adopted DPD. As the Council would not be able to demonstrate it is planning to meet its housing requirement in full, and the likelihood of not being able to demonstrate a five-year housing land supply, it would be difficult to recommend refusal of a planning application for these sites.

Policy Context

41. The preparation of a Site Allocations DPD is a requirement of the adopted District Plan. It was therefore identified in the 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

42. The Council could choose not to adopt the Sites DPD, the implications of this are set out in paragraphs 35 - 40.

Financial Implications

43. The Sites DPD, accompanying evidence base and examination have been funded by a specific reserve for this purpose. There are no further direct costs associated with the Sites DPD.

Risk Management Implications

44. Adoption of the Sites DPD will enable the Council to demonstrate that it is meeting its current housing and employment needs in full and set policy requirements for the implementation of the allocated sites.
45. Should the Council decide not to adopt the Sites DPD, it would not be able to demonstrate how it is planning to meet its housing and employment needs – a requirement of National Planning Policy. It would place the five-year housing land supply requirement at risk. These issues would make the Council vulnerable to unplanned, speculative development.

Equality and Customer Service Implications

46. An Equality Impact Assessment has been prepared and has been published at all stages alongside the Sites DPD, to ensure opportunities to promote equality and/or barriers to service are considered and addressed.

Other Material Implications

47. There are no other material considerations.

Sustainability Implications

48. It is a legal requirement for the Sites DPD to be accompanied by a Sustainability Appraisal (incorporating Strategic Environmental Assessment) at each formal stage of the plan-making process. The SEA/SA 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. The Sites DPD was accompanied by Sustainability Appraisal at each stage of the process. The Inspector confirms that the Sustainability Appraisal was prepared in accordance with best practice and robust and meets legal requirements.

Appendices

Appendix A: Report on the Examination of the Mid Sussex Site Allocations Development Plan Document

Appendix B: Sites DPD Examination – Main Modifications

Appendix C: Site Allocations Development Plan Document – Adoption Version

Appendix D: Adoption Statement (Proposed, subject to Council’s approval to adopt)

Background Papers

The adopted Policies Map and proposed changes as a result of the Sites DPD are available online at <https://www.midsussex.gov.uk/planning-building/policies-maps/>

The full evidence base, examination library and examination documents are available online at www.midsussex.gov.uk/SitesDPD



The Planning Inspectorate

Report to Mid Sussex District Council

by Mike Fox BA (Hons) Dip TP MRTPI

an Inspector appointed by the Secretary of State

Date: 30 May 2022

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Mid Sussex Site Allocations Development Plan Document

The Plan was submitted for examination on 16 December 2020

The examination hearings were held between 1 and 16 June 2021

File Ref: PINS/D3830/429/6

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Abbreviations used in this report

AH	Affordable Housing
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BLV	Benchmark Land Value
C2	Use Class C2 (Residential institutions, such as care homes)
CC	County Council
CSA	CSA Environmental (consultants)
DC	District Council
DfT	Department for Transport
dpa	Dwellings per annum
DPD	Development Plan Document
dph	Dwellings per hectare
DTC	Duty to Cooperate
E	Use Class E (Commercial, Business and Service)
EA	Environment Agency
ha	hectare
HEDNA	Housing and Economic Development Needs Assessment
HMA	Housing Market Area
HRA	Habitats Regulation Assessment
IDP	Infrastructure Delivery Plan
IR	Inspector's Report
km	kilometres
LEP	Local Economic Partnership
LGS	Local Green Space
LPA	Local Planning Authority
LUC	Land Use Consultants
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
m	metres
MIQ	Matters Issues and Questions
MM	Main Modification
MSDC	Mid Sussex District Council
MSTS	Mid Sussex Transportation Study
NE	Natural England
NP	Neighbourhood Plan
OAN	Objectively Assessed Housing Need
OCP	Opportunities and Constraints Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Alternative Natural Greenspace
SCG	Statement of Common Ground
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority

SEL	Strategic Employment Land
SEP	Strategic Economic Plan
SHLAA	Strategic Housing Land and Employment Land Availability Assessment
SPA	Special Protection Area
sq ft	square foot
STP	Science and Technology Park
SuDS	Sustainable Drainage System
TA	Transport Assessment
<i>The Framework</i>	National Planning Policy Framework (NPPF) July 2021 version
WSCC	West Sussex County Council

Non-Technical Summary

This report concludes that the Mid Sussex Site Allocations Development Plan Document provides an appropriate basis for the planning of the District, provided that a number of main modifications [MMs] are made to it. Mid Sussex District Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications. The MMs were subject to public consultation over an eight - week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Reduce allocation SA25 at Land West of Selsfield Road, Ardingly, from 70 to 35 dwellings in order to align its proportionality to the size and needs of the existing settlement and to ensure its status as a minor development within the High Weald Area of Outstanding Natural Beauty (AONB);
- Modify policy SA20 for 550 dwellings at Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, to include provision for at least 142 older persons' dwellings on a specific designated site within the overall allocation;
- Modify policy SA20 to ensure regular monitoring of the proposed Suitable Alternative Natural Greenspace (SANG);
- Include new criteria-based policy to provide for specialist accommodation for older persons' housing within Mid Sussex;
- Modify policy SA13 for 300 dwellings at Land East of Keymer Road and South of Folders Lane, Burgess Hill, to ensure the acceptable mitigation of its impact on the setting of the South Downs National Park; (SDNP)
- Modify policy SA14 for Land to the South of Selby Road, Burgess Hill, to specify proposed vehicular access;
- Modify various policies for new housing within the High Weald AONB, to ensure the inclusion of the requirement to conserve and enhance the landscape and scenic beauty of the AONB;
- Modify policy SA22 for Land North of Burleigh Lane, Crawley Down, to specify and secure proposed vehicular access;
- Modify policy SA29 for Land to South of St Stephens Church, Hamsland, Horsted Keynes, regarding vehicular and pedestrian access and tree protection;
- Modify policy SA31 for Land to the rear of Firlands, Church Road, Scaynes Hill, to secure provision of safe and convenient pedestrian access.

- Modify policy SA34, to ensure reasonable marketing expectations when determining applications for change of use from employment to non-employment sites;
- Modify policy SA37 for the Burgess Hill/Haywards Heath Multifunctional Network, to ensure effective mitigation of ecological impact;
- Modify policy SA35 for the safeguarding of Land for Delivery of Strategic Highway Improvements, to meet the requirement for biodiversity net gain;
- Include a new monitoring indicator, related to biodiversity net gain; and
- Include a few other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Mid Sussex Site Allocations Development Plan Document Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (*the Framework*) (paragraph 35) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Mid Sussex Site Allocations Development Plan Document submitted in December 2020 is the basis for my examination. It is the same document as was published for consultation in August 2020.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs. The schedule was subject to public consultation for eight weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as *Policies Maps for Draft Submission Site Allocations DPD Regulation 19* (comprising 21 main maps and a number of insets).
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

7. These further changes to the policies map were published for consultation alongside the MMs (Document DPD3a – Main Modifications – Policy Maps, dated November 2021).
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the MMs.

Context of the Plan

9. The Mid Sussex Site Allocations Development Plan Document (2014-2031) is the Part 2 or 'daughter plan' to the Mid Sussex District Plan, covering the same planning period. It allocates additional development sites to meet the residual amount of housing and employment land to meet the strategic requirements set out in the District Plan. It also updates, through policy SA10, the residual housing requirement set out in policy DP4 of the District Plan, along with its spatial distribution. Further, it provides a more detailed planning framework for the implementation of a Science and Technology Park, to serve the economy of the wider sub region.
10. Mid Sussex is a largely rural District, in geographical terms, focused on the three towns of Burgess Hill, Haywards Heath and East Grinstead. It is well located by rail and road to London to the north and Brighton to the south, with easy access to Gatwick Airport, a few miles to the north of the District, leading to high pressures for development. About half the area of the District, mainly in the north, is designated within the High Weald Area of Outstanding Natural Beauty (AONB), whilst the southern part of the District is within the South Downs National Park (SDNP) and falls outside of the planning jurisdiction of the District. Around a quarter of the District in the north-east, largely overlapping with the AONB, forms part of the Ashdown Forest 7 km Zone of Influence, which further limits development options within the District.
11. Mid Sussex's attractive physical environment, high Gross Domestic Product (GDP) and accessible location, is reflected in its high house prices. There is a fine balance to be struck between maintaining its superb physical assets, respecting its development constraints, whilst meeting its not inconsiderable housing and employment needs in a sustainable way.

Public Sector Equality Duty

12. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has taken into consideration several matters during the examination including qualitative housing needs, such as housing for older people, and acknowledging that aspects such as affordable housing and accessible housing are covered adequately within the District Plan. The Plan satisfactorily addresses gypsy and traveller

accommodation, although again, this subject is addressed in the District Plan at a strategic level.

Assessment of Duty to Co-operate

13. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
14. The Plan, as a Site Allocations DPD, or Part 2 Plan, is largely non-strategic in nature. Therefore, in the main, the Council is not required through its strategic policy making duties to co-operate further with the specific Duty to Co-operate (DTC) bodies, having already done so for the preparation of the strategic District Plan. However, the Council has sought to engage with its neighbouring authorities during the preparation of this Plan. This has included where site allocations are in close proximity to neighbouring local planning and highway authorities, for example in relation to site allocations SA19 and SA20, which are close to the neighbouring District of Tandridge and Surrey County Council, where highways and other impacts have been jointly assessed.
15. There has also been joint consideration between the Council and the South Downs National Park Authority (SDNPA) in relation to the potential impact of proposed housing schemes on the setting of the National Park, for example in relation to site allocations SA12 and SA13, on the south-east fringe of Burgess Hill. These two allocations are also close to the boundary of the District of Lewes and East Sussex County Council, and there has been ongoing joint considerations in relation to policy SA37 which proposes the Burgess Hill/Haywards Heath Multifunctional Network.
16. There has also been ongoing joint work on environmental matters with the High Weald AONB Unit and several other local planning authorities and bodies and agencies, especially in relation to the potential impacts of new development on the Ashdown Forest Special Protection Area (SPA) in the neighbouring District of Wealden, including its 7 kilometre Zone of Influence, which extends into Mid Sussex.
17. In all of the above areas where joint working and co-operation has been undertaken, the Council has pointed to Statements of Common Ground (SCGs) which confirm that the Council has co-operated with its neighbouring local planning and highway authorities, in addition to the SDNPA, the High Weald AONB Unit and relevant statutory bodies. These are set out in detail in the Council's DTC Statement¹.
18. Concern was expressed in representations and debated in the hearing sessions that the DTC has not been complied with, for example in

¹ Examination Statement DC1

relation to the housing needs of other areas and traffic and visual impacts associated with several proposed site allocations in the Plan, some of which I cover later in my report. The evidence, however, clearly points to a history of ongoing co-operation with a range of parties, including statutory bodies, local planning authorities and action groups, in relation to these site allocations and other policies. All the responses from statutory consultees have been broadly supportive of the Plan. It is also important to recognise that the DTC is not a duty to agree.

19. On the basis of the above evidence, I am satisfied that where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

20. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified seven main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan. The bulk of my report now addresses each of these main issues below.

Issue 1 - Are the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) justified and do they provide effective input into the policies of the Plan?

Sustainability Appraisal (SA)

21. The evidence submitted and which came to light during the examination of the Plan shows that the SA has been undertaken at each stage in the preparation of the Plan, with the overall process, including an appraisal of reasonable alternatives, summarised in the non-technical summary². The Council also set out a topic paper³ to further explain the SA process. It is important to recognise that the Plan is in effect the 'daughter document' of the District Plan, meaning that its scope is necessarily limited by the strategic parameters of the District Plan. It would therefore be inappropriate if the SA for this Plan were to provide

² Mid Sussex SA DPD Sustainability Appraisal (Incorporating Strategic Environmental Assessment) Non-Technical Summary Regulation 19; July 2020.

³ Mid Sussex DC-TP3: Introduction to the Site Allocations DPD; December 2020.

input into strategic options, which will no doubt be assessed at the review stage of the District Plan.

22. The baseline information covers a wide mix of social, environmental and economic issues, and they are clearly set out in the main SA report. The SA comprehensively identifies the current sustainability issues faced by Mid Sussex, which include the District's increasing and ageing population; the need for affordable housing in the context of high house prices/housing stress and a few pockets of deprivation; high car ownership; a high quality natural environment; high pressure on water usage in an area of potential water shortage; high flood risk in certain areas; high levels of commuting, including to London; some infrastructure deficits in sewerage and water supply, transport and play provision, which could be exacerbated by further development; and the potential for the three main town centres to benefit from regeneration and renewal.
23. The assessment of reasonable alternatives involved detailed evidence testing against 16 sustainability criteria and I am satisfied that this work was carried out at an appropriate level of thoroughness for a local plan and that these criteria are appropriate for assessing the sustainability of the Plan. It is also important to bear in mind that the main strategic direction for development in Mid Sussex has already been determined through the District Plan, which itself had undergone SA, and that the focus of the SA for this Plan was to consider the most sustainable outcomes for the residual requirement, i.e. the 1,280 dwellings still (as a minimum) required as the residual figure which was changed during the examination to meet the District Plan requirement⁴.
24. Whilst concerns have been raised that insufficient alternatives were considered and that 'wrong' or unsustainable allocations were included in the Plan, these representations were often linked to alternative housing sites which did not make it to the final allocation stage. However, the SA work is only part of the site selection process, and sufficient sites were considered and selected to meet the overall residual requirements of the District. Moreover, the SA employed a three-option set of reasonable alternatives for assessment, which included a list of 20 'constant' sites (Option A), a list of constant sites plus three additional sites in the Folders Lane area of Burgess Hill (Option B), and finally a list of constant sites plus a site at Haywards Heath Golf Course (Option C). The assessment of these three options was clear and transparent and, in my view, was rigorous.
25. Some representations argued that the SA process was insufficiently rigorous in diverting development away from the High Weald AONB. However, in a District with such a large proportion (over 50% of its land area) within the AONB as well as containing additional areas within the

⁴ See Document MSDC-06b.

setting of the SDNP, it is inevitable that conflicts were going to arise between meeting housing need and environmental protection, given the community needs of settlements within the AONB for limited development schemes. It would therefore be unreasonable in my view to have imposed a blanket ban on development allocations within the AONB, a view which is supported by the High Weald AONB Unit. Difficult choices have had to be made, as witnessed by the large volume of objectors to several of the allocations in the Plan.

26. I am satisfied, however, from the detailed evidence in written submissions and at the examination hearings, that the SA work got the balance right, and that key sustainability considerations, such as the need for affordable housing (AH) and sufficient employment land, have been taken into account as well as environmental criteria.
27. In addition to assessing land for new housing allocations, the SA appraised 24 potential employment sites, aligned into three options, plus two options for a Science and Technology Park (STP) as well as allocating sufficient employment site provision to meet local, as well as sub-regional need. Again, the process in achieving this is justified, clear and transparent. The detailed evidence points to the SA being a major influence in informing key development decisions, rather than being a bolt-on process.
28. I also note from the examination evidence that no adverse effects are identified in the SA that cannot be effectively mitigated, and that most of the preferred options which have been included in the Plan do not contain any significant negative impacts against any of the SA objectives.
29. Overall, I am satisfied that the SA was methodical, clear and transparent and was prepared in accordance with best practice, in an iterative fashion. It is therefore robust.

Habitats Regulations Assessment (HRA)

30. The Council makes it clear in its response to the Matters, Issues and Questions (MIQs) discussion document that the full District Plan housing requirement of 16,390 dwellings, of which a residual of 1,280 dwellings is subject to this Plan, is contingent on the findings of the HRA. The Council's response to the MIQs⁵ demonstrates that HRA reports were undertaken for each stage of the preparation of the Plan.
31. In addition, the HRA assessed the potential effects of development on the Ashdown Forest, which is located within the neighbouring District of Wealden, close to the north-east boundary of the District; its 7

⁵ MSDC: Site Allocations DPD-MSDC-02b: Matter 2 – Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA); 14 May 2021.

kilometre (km) Zone of Influence extends into the District, including 'washing over' East Grinstead, one of the three main settlements in Mid Sussex. The Ashdown Forest is designated as a Special Area of Conservation (SAC) because of the presence of breeding populations of Dartford warbler and European nightjar, and it is a SAC because of its heathland habitats.

32. The HRA which was carried out for the Regulation 19 Plan concludes that the Plan does not present any potential risks to any European sites that are not considered capable of being mitigated. The HRA also concludes that, in addition to the impact of development, adverse effects on the integrity of the Ashdown Forest SPA and SAC relating to air quality and recreation impacts can be ruled out. Therefore, the Plan is justified and effective in relation to the Habitats Regulations. I note that Natural England (NE) supports the HRA conclusions and from the evidence before me, I see no reason to come to a different conclusion.
33. The Council has also taken account of the 'People Over Wind & Sweetman' judgment in its HRA. The SA cross-references to the HRA for matters concerning the Ashdown Forest. The relevant mitigation in relation to proposed site allocations includes a strategic SANG as part of policy SA20.

Issue 1 - Conclusion

34. I conclude that the SA and HRA are justified and provide effective input into the policies of the Plan.

Issue 2 – Does the Plan deliver both the quantitative and qualitative aspects of housing provision in the District Plan to meet Mid Sussex's requirements over the plan period in accordance with national policy?

Quantum of housing provision

35. The District Plan for Mid Sussex, covering the years 2014-2031, sets out a minimum requirement of 16,390 new homes for Mid Sussex⁶. Policy DP4 in the District Plan explains that this figure exceeds the objectively assessed needs (OAN) figure, which was calculated at 14,892 dwellings, i.e. providing a buffer of 1,498 dwellings, or 9.14 per cent; this figure addresses the unmet housing need of the North West Sussex Housing Market Area (HMA), principally related to Crawley.

⁶ That is, the housing requirement for Mid Sussex District outside the South Downs National Park, which is a separate local planning authority.

36. Most of Mid Sussex's housing provision over the plan period is accounted for by four strategic developments proposed in the District Plan. These are located at:
- (i) Kings Way, Burgess Hill (to the east of the town) (policy DP8) for up to 480 new homes;
 - (ii) North and North-West of Burgess Hill, on land referred to as the Northern Arc (policy DP9) for approximately 3,500 additional homes;
 - (iii) Land to the East of Pease Pottage (policy DP10) for approximately 600 new homes (linked to addressing Crawley's unmet housing need); and
 - (iv) Land to the North of Clayton Mills, Hassocks (policy DP11) for approximately 500 new homes.
37. These four strategic sites comprise a total of 5,080 dwellings, representing a substantial proportion (30.9%) of the District Plan requirement for Mid Sussex.
38. The submitted Plan, policy SA10, also sets the scene in relation to numbers of housing completions, commitments through sites with planning permission, allocations made in Neighbourhood Plans (NPs) and a windfall allowance. This leaves a residual housing requirement, to be addressed in this Plan, which was estimated in District Plan policy DP4 to be 2,439 dwellings, and which has reduced over the period from April 2017 to the submission of this Plan, in December 2020, to 1,280 dwellings.
39. Policies SA12-SA33 allocate sites for a minimum of 1,764 units, resulting in an oversupply of 484 dwellings, or 2.95 per cent of the District Plan requirement. However, the Council updated this calculation and presented it towards the end of the hearing sessions⁷, in the following table (Table 3 Housing Supply), which I have amended slightly (see Note (1)):

⁷ Mid Sussex DC – Updated Housing Land Supply Trajectory; dated 11 June 2021 - Response to AP4 Matter 3.4 [Examination Document MSDC-06b].

	Examination Update (as at April 2021)
District Plan Requirement	16,390
Completions	6,033
Commitments (planning permissions, District Plan allocations and Neighbourhood Plan allocations)	9,140
Windfalls	420
Site Allocations DPD (1)	1,704
Total supply during plan period	17,297
Over supply	+907

Note (1) Allocation SA25 is reduced in total from 70 to 35 dwellings (MM1); therefore, the allocations total in this Plan is reduced from 1,764 to 1,704 dwellings.

40. The over-supply of 907 units amounts to a buffer of 5.5%, which, other things being equal, amounts to a reasonable amount of flexibility, and answers the representations of several parties, who expressed the view that the earlier figure of 2.95% was inadequate. Some representations object to the size of the oversupply, claiming it is unnecessary and therefore wasteful of land. However, national policy, as expressed in paragraph 74 of *the Framework*, talks about a 5% figure as being appropriate to ensure choice and competition in the market, and in my view the size of the buffer is not unreasonably high in relation to the housing needs of the District.
41. I assess below whether I consider the delivery rates of the proposed housing provision, including the strategic sites and the allocations (SA12-SA33) in the Plan, are realistic as well as the Council's assumptions around non-delivery and windfalls. But the 'basic maths' of the Council's housing provision is accepted in this report as a valid starting point for examining the quantum of housing provision for Mid Sussex.
42. It is important, however, for the Plan to illustrate the anticipated rate of housing development over the plan period, and this needs to be shown on a year-by-year basis, in accordance with paragraph 74 of *the Framework*. Modification **MM16** therefore includes the Council's trajectory for housing completions within the plan period. This is also an important tool for the effectiveness of the Plan.

43. In assessing the effectiveness of the Council's housing provision, I need to look at whether the following implementation rates are realistic:
- for the four strategic sites in the District Plan;
 - for the 22 allocations in the Plan;
 - for non-implementation; and
 - for windfalls.

The four strategic sites

44. Concerns were expressed by representors as to whether the actual delivery of the quantum of housing provision proposed in Mid Sussex can match the Council's trajectory. The reliance on strategic sites is set in the District Plan, which was found to be sound; however, given the length of time that has elapsed since the adoption of the District Plan (March 2018), I consider the question to be a reasonable one to ask. I therefore requested the Council to provide me with an update of progress and future estimates of completions in relation to the four strategic sites, including comments from sources 'on the ground', such as site promoters and house builders.
45. The first of the strategic housing sites at Kings Way, Burgess Hill (policy DP8) has been under construction since 2015, and the necessary on-site and off-site infrastructure is now in place. Phases 1-3a, amounting to 235 units, have been completed, with a further 39 units in phase 3b under construction, averaging in the region of 47.5 dpa since the first dwellings were started. A full planning permission has been granted for a further 237 units to be implemented over the period 2022/23 – 2026/27. The total yield of 513 units will then have exceeded the original estimate in policy DP4 by 33 units. These figures and dates are all confirmed in a SCG signed between the Council and the developers⁸.
46. The second of the strategic housing sites is the Northern Arc, Burgess Hill (policy DP9). Concern was expressed by representors that the Plan is over-reliant on this strategic development, which alone accounts for 21.4% of the total housing requirement over the plan period. This concern is all the more pressing in the light of the lack of progress in relation to the delivery of housing on the ground, raising the serious prospect that the stalling of this development could derail the effectiveness of the Plan in delivering its overall housing target for Mid Sussex. This is critical to the soundness of this Plan, which in turn impacts on whether the residual housing requirement in this Plan is sufficient for soundness.

⁸ SCG between MSDC and Persimmon Homes regarding Kingsway, Burgess Hill, District Plan policy DP8 (480 units); signed 4 June 2021 [Examination Document AP3a].

47. The critical questions for this report to consider are first, what are the reasons why progress on this strategic housing allocation has been delayed? Also, what are the realistic prospects that District Plan allocation DP9 can deliver housing in significant numbers to ensure the soundness of the Plan? The Council has submitted a detailed Note and a SCG signed by the Council and Homes England in response to these concerns⁹.
48. The first major consideration in answering these questions is to look at what has happened since the adoption of the District Plan. Strategic sites, such as allocation DP9, often require considerable investment in major infrastructure prior to the development of any housing. From the evidence submitted, it is clear that there has been significant progress in this regard. Furthermore, there has been a positive impact on the delivery mechanism of the site and the financial backing of the allocation with Homes England taking over ownership of the site in July 2018 from three developers/promoters. Homes England has now assumed the role of key master developer delivery lead.
49. Within a few weeks of Homes England taking over, a masterplan was approved by the Council in September 2018 and outline planning consent was granted for 3,042 units in October 2019. A substantial amount of necessary infrastructure work to enable site delivery has been, and is being, undertaken, including securing permissions for the construction of two key roads – the Eastern Bridge Link Road and the Western Link Road, which together form the spine of the total development; both of these projects are scheduled for construction during the period late 2021-mid 2022. Other key infrastructure components include the up-grading of the A2300 (the major link to the A23 – work has already been completed by April 2022); investment in the Goddard's Green Wastewater Treatment Works (to secure odour mitigation by the end of 2021); and the first primary school (due to open in September 2023).
50. It is also unsurprising that the impact of Covid-19, something that could not have reasonably been foreseen during the preparation and examination of the District Plan, has taken its toll on the rate of progress. Another consideration which has to be factored in, due to its proximity to strategic allocation DP9, is allocation SA9 for the proposed STP, immediately to the west of the Northern Arc strategic housing site, for an estimated 2,500 jobs, necessitating its own significant and costly infrastructure which needs to be integrated with the Northern Arc proposals.

⁹ Council Note MSDC 05b [Action Point AP3b] in response to Matter 3.1 (iv) – SCG between MSDC and Homes England regarding the Northern Arc District Plan policy DP9 (3,500 homes); 9 June 2021.

51. The above mentioned Note and SCG have taken stock of the situation and revised the estimates of housing delivery that are in the District Plan housing trajectory. The initial estimate of 3,042 homes in the outline consent has now been reduced to 2,310, with the balance of 730 homes to be developed outside the plan period. The national document which addresses delivery of strategic sites – *Start to Finish*¹⁰ – produced by Lichfields, which is regularly referred to in local plan examinations, states that the average lead times for large sites (500+) is around 36 months from obtaining planning permission to first dwelling completion (page 5 of the report).
52. However, *Start to Finish* covers sites across England and South Wales, and I cannot find any acknowledgement in the document that some parts of the country have greater pressures for housing development than others. This is especially relevant for areas such as Mid Sussex with its relatively close proximity to London, its high prosperity (about to be stimulated even further by the proposed STP), proximity to the coast and acknowledged high quality landscape.
53. I note that the first site to come on stream at the Northern Arc, at Freeks Farm, for 460 dwellings, has succeeded in reducing this time from 36 to 24 months. I also note that Homes England are in advanced negotiations with several phase 1 developers to deliver 653 homes with contracts to submit reserved matters applications within 100 days from the start of contract, using a number of contractual mechanisms. These include providing support for small builders through diversification, using methods of modern construction, simplifying procurement using Homes England's Building Lease arrangements which are contracted to deliver between 115% to 150% of the market rate.
54. I note the comments from some parties that even Homes England cannot influence market forces. Nevertheless, it is clear that Homes England has achieved faster delivery times than hitherto for the reasons set out above, and on this basis, I see no reason why the Council's revised projected delivery rates should not be considered realistic.
55. The evidence points to a significant upsurge in the building rate from hereon in. The above mentioned Note and SCG set out, in detail, scheme-by-scheme tables, and summarised in financial years, a projected delivery rate of 460 completions at Freeks Farm by 2025/26 and 2,310 homes on the remainder of the Northern Arc up to 2030/31, producing a combined total of 2,770 dwellings.
56. The third strategic site, at Pease Pottage (policy DP10) has yielded 199 completions since 2019/20. It is on track to deliver 619 dwellings by

¹⁰ Lichfields: *Start to Finish* – What factors affect the build-out rates of large scale housing sites? Second Edition; February 2020.

2023/24, i.e. a small surplus of 19 dwellings, well within the plan period. The relevant details are set out in a SCG between the Council and Thakeham Homes Ltd¹¹, and I am satisfied that the dwellings completion rate is realistic.

57. The fourth strategic site, on land North of Clayton Mills, Hassocks (policy DP11) is programmed to deliver its full complement of 500 dwellings by 2028/29. The relevant details are set out in a SCG between the Council and Taylor Wimpey, and I am satisfied that the dwellings completion rate is realistic.
58. The updated evidence points to a reduced total for the four strategic sites during the plan period of 4,402 dwellings, down from the District Plan total of 5,080, i.e. a reduction of some 678 dwellings. I am satisfied, based on the above considerations, that the reduced total stands a realistic chance of being implemented over the plan period.

The residual site allocations and their distribution

59. Most of the 22 housing allocations in the Plan were debated at the examination hearings, with a small minority attracting none or minimal comments or challenges regarding their soundness.
60. The distribution of the proposed 1,764 dwelling units in the 22 allocations in this Plan largely follows the strategic parameters for sustainable growth set out in policy DP4 of the District Plan. The District Plan Inspector's Report (IR) commented (Para 32) that the settlement hierarchy needed to provide sufficient guidance on the numerical distribution of housing for this Plan with a significant risk that unbalanced growth could take place in inappropriate locations or that growth in sustainable locations could be suppressed. The consequential changes to the District Plan's settlement strategy took this advice on board.
61. The District Plan, and in particular policy DP4, provides quantitative and qualitative strategic parameters which govern the overall distribution of settlements in Mid Sussex.
62. Firstly, a significant proportion of the residual housing and the majority of the employment land provision is focused in and around Burgess Hill, which, together with Haywards Heath, is one of the two most sustainable settlements in the District and which has the greatest opportunities for sustainable growth in Mid Sussex.
63. The District Plan also addresses some of the unmet housing need in North West Sussex (primarily Crawley).

¹¹ MSDC 05c: SCG between MSDC and Thakeham Homes Ltd regarding Pease Pottage site policy DP10 (600 homes); 9 June 2021 [Examination Document AP3c]

64. District Plan policy DP4 also sets out a sustainable settlement hierarchy for Mid Sussex, providing numerical guidance (in dwelling numbers) over the plan period at five distinct levels, which are updated in policy SA10 in the submitted Plan as follows:
- Towns – 10,653 minimum required; updated minimum residual housing figure 706
 - Larger villages – 3,005 required; updated minimum residual housing figure 198
 - Medium sized villages – 2,200 required; updated minimum residual housing figure 371
 - Smaller villages – 82 required; updated minimum residual housing figure 5
 - Hamlets – windfall growth only
65. District Plan policy DP17 also states that the proposed distribution of housing in Mid Sussex can be implemented where it does not cause further harm to the integrity of Ashdown Forest SAC.
66. District Plan policy DP18 states that development that contributes to the setting of the SDNP 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 SDNP, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.
67. District Plan policy DP16 states that small scale proposals which support the economy and social wellbeing of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.
68. The relationship of the distribution of the housing allocations in this Plan to the strategic parameters in the District Plan which I have outlined above was raised in several representations and debated at the hearing sessions. Clearly, significant departures from the strategic settlement distribution, in terms of either numbers of dwellings or principles of environmental sustainability, would amount to a soundness concern.
69. Several concerns in relation to the above strategic parameters were expressed during the examination and I deal with these below.

Concerns over the perceived overconcentration of housing allocations at Burgess Hill

70. The Plan focuses a significant proportion of the residual housing allocations, totalling 642 dwellings, at Burgess Hill. This town is a highly sustainable settlement, and it is the primary focus for the District Plan housing strategy including the location of two of the four strategic housing sites (78.3% of the total of units), as well as being the location for the proposed STP and most of the other employment sites allocated in the Plan. The concentration of development, including housing, is clearly in accordance with the District Plan strategy.

Concerns over the perceived under-provision of housing at Haywards Heath

71. Haywards Heath has almost the same population as Burgess Hill and is not the focus of a significant amount of new development proposed in the Plan. However, it is within close proximity to Burgess Hill for access to its services and facilities (although it is also a major service provider), and I note that it has received a large amount of recently consented development, some still in the pipeline. Again, the Plan reflects the District Plan strategy, which proposes no strategic housing sites at Haywards Heath, and for the above reasons it is my view that there are no soundness issues raised by the relatively low level of residual housing provision allocated at Haywards Heath.

Concerns over the increased focus of the Plan on the three main towns in relation to the District Plan strategy

72. The allocations in the Plan for the three top tier (Category 1) settlements of Burgess Hill, Haywards Heath and East Grinstead almost double the updated minimal residual housing figure in the District Plan strategy; the submitted Plan allocates 1,409 dwelling units within and on the edge of the three main settlements, which is an increase of 703 units above the suggested amount in policy DP4. Given that these three towns are the most sustainable settlements in Mid Sussex, even the significant amount of additional housing focused on these towns is not contrary to the District Plan strategy of placing its emphasis on development in and around the main towns, and no soundness issues are raised by the increased focus on these three towns.

Concerns over the perceived overconcentration of housing for the East Grinstead/Crawley Down/Felbridge area

73. The allocations in the Plan for the East Grinstead/Crawley Down/Felbridge area have raised concerns over impact of the two largest allocations, for 200 and 550 dwellings, on highways capacity and the lack of any employment allocations in this area. However,

employment opportunities exist in East Grinstead, whilst Crawley is a focal point for job opportunities (including Gatwick Airport) and is within easy commuting distance from this area. The Plan also allocates a few employment sites in the north of the District, near Copthorne and Pease Pottage. Impact on the highways network is acknowledged, although congestion is not considered by the Council or by West Sussex County Council (WSSCC) as the local highway authority to be at the level of 'severe', an issue which I consider in some detail later in this report. The evidence before me therefore indicates that these allocations sound.

Concerns over under-provision of allocated housing in the larger villages (local service centres)

74. Policy SA10 updates District Plan policy DP4 and makes provision for an updated minimum residual housing figure of 198 units for the six second tier, larger villages; the submitted Plan allocates 105 units, i.e. a reduction of 93 units below the District Plan figure. However, the residual District Plan housing figure, as updated, represents a small percentage of the total District Plan provision for Mid Sussex, and the shortfall in the Plan before me, of 93 dwellings, is only 3.1 percent of the total District Plan provision for category 2 settlements, whilst three of the six settlements in this category have specific allocations and the remaining three villages – Copthorne, Hurstpierpoint and Lindfield - are located close to urban areas (Crawley, Hassocks and Haywards Heath respectively). For the above reasons, no soundness issues are raised by the level of provision in the larger villages.

Concerns over under-provision of allocated housing in the medium sized (third tier) villages

75. Policy SA10 updates District Plan policy DP4 and provides for an updated minimum residual housing figure of 371 units for the 12 third tier, medium sized villages; the submitted Plan allocates 238 units, i.e. a reduction of 133 units below this figure. However, the residual District Plan figure, as updated, represents a small percentage of the total District Plan provision for Mid Sussex, and the shortfall in the Plan before me, of 133 dwellings, is only 6% of the total District Plan provision for category 3 settlements. Moreover, 8 of the 12 settlements in this category have specific allocations; of the remaining villages, West Hoathly is located within the 7 km Area of Influence around the Ashdown Forest SPA, Pease Pottage is the site of one of the 4 strategic housing sites and Balcombe is within the High Weald AONB and has a station situated on the London to Brighton railway with correspondingly good access to other housing areas. For the above reasons, I consider the level of provision in the Plan for the medium sized villages to be sound.

Concerns over the perceived impact of proposed housing allocations on the setting of the SDNP and the character and appearance of the High Weald AONB

76. I will address these issues later in my report, and any initial conclusions set out in this section of my report will be subject to my conclusions in relation to these landscape-based issues.

Concerns over development in small villages and the open countryside

77. Policy SA10 updates District Plan policy DP4 and provides for a very small updated minimum residual housing figure for the 5, 4th tier smaller villages, totalling 5 units; the submitted Plan allocates 12 units, an increase of 7 units above the updated suggested figure which still amounts to a very small total. Assumed growth in the smaller hamlets will be from windfalls only. This accords with District Plan policy DP15, which places a strict limitation on new homes in the countryside.

Residual allocations and their distribution - conclusion

78. From the evidence before me, I am satisfied that the overall distribution of residual housing allocations is in general conformity with the strategic framework set out in policy DP4 of the District Plan.

Should an allowance for non-implementation be included in the Plan?

79. The Council has applied a 40% non - implementation rate to small sites and this is borne out by the recent track record of planning permissions in Mid Sussex. (This is defined by the Council as being between 1-4 units inclusive). No consistent evidence is available to apply a standard rate to larger sites, which have been assessed individually. The implementation rate of the largest, strategic sites has been assessed in close liaison with the relevant developers (see above), and as I have already indicated, the estimated yields are considered to be realistic. It was also pointed out in representations that the overprovision of the Plan in relation to the residual requirement also provides cover for non-implementation, a point I accept.

80. Taking all these points into consideration, I am satisfied that an adequate allowance has been included in the Plan for non-implementation.

Would the Plan at adoption be able to demonstrate that it has a 5-year housing land supply of specific, viable and deliverable sites to meet the Plan's requirements?

81. In response to questioning during the examination hearing sessions, the Council updated its 5-year housing land supply statement¹². This covers the 5-year period from 1 April 2021 to 31 March 2026, and has followed the requirements of national policy, as set out in paragraph 75 of *the Framework*. The statistical base for the calculations is the District Plan, which is less than 5 years old and which states (policy DP4) that the annual housing requirement for Mid Sussex is 876 dpa up to 2023/24, with a stepped trajectory which rises to 1,090 dpa between 2024/25-2030/2031.
82. I note that both the IR for the District Plan and the view of an Inspector at a recent appeal¹³ have stated that the shortfall in the District should be spread over the plan period and not just over 5 years. One of the principal reasons given for spreading the shortfall over a longer period than the 'normal' 5 years is the time required to implement the large strategic sites, especially the Northern Arc, in order to ensure that major highways and other elements of infrastructure are in place prior to housing completions in any numbers, and this factor of course is also linked to the adoption of a stepped housing trajectory. I am therefore satisfied that spreading the shortfall out over the rest of the plan period, sometimes referred to as the 'Liverpool' method, is appropriate for Mid Sussex (as opposed to the 'Sedgefield' method, which requires the entire shortfall to be included within the five year calculation).
83. The total shortfall over the period since the start point of the District Plan in 2014 is 99 dwellings, whilst the completions in the two most recent years has exceeded the annual requirement (+127 dwellings in 2018/19 and +240 dwellings in 2020/21). I therefore agree with the Council that this amount of shortfall justifies applying a 5% buffer over the remainder of the plan period. I note that the Council's 5-year requirement, taking these factors into consideration (including three years at 876 dpa and the remaining two years at 1,060 dpa) is 5,100 dwellings.
84. The Council's summarised calculation¹⁴ gives a 5-year land supply figure of 5.59 years. The Council has also included an appendix to this document, which is a detailed site-by-site analysis of every planning permission, including sites under construction, major (10+ dwellings) and minor sites, together with an assessment of site allocations which it is considered are likely to yield dwellings within the 5-year period. I am

¹² MSDC 06a Response to AP4 Matter 3.4: Housing Land Supply – 5 year Housing Land Supply Statement; 11 June 2021 [Examination Document AP4].

¹³ Appeal – Land off London Road, Bolney APP/D3830/W/19/3231997.

¹⁴ Calculation table at para 5.1 of Examination Document AP4 (MSDC 06a).

satisfied that this level of detail is sufficient to demonstrate that the Council's estimates on future delivery are reliable beyond reasonable doubt.

85. I have noted the concerns of some parties that the delivery rates assumed by the Council are optimistic and unrealistic. However, progress on major infrastructure in relation to the strategic sites (especially in relation to the Northern Arc, for example completion of the two link roads), appears from reading the SCGs, to have reached the point where predictions on the delivery of homes can be made with more certainty than hitherto. It should also be borne in mind that the calculation of supply is not an exact science, with the impact of Covid-19 a case in point.
86. On the basis of the above considerations, I am satisfied that the Council can demonstrate, to a reasonable degree of certainty, a 5-year supply of housing land to meet the Plan's requirements.

Is the reliance in the Plan on windfall sites (504 dwellings or 84 dpa for the rest of the plan period) realistic?

87. Paragraph 69 of *the Framework* states that, as part of promoting a good mix of small and medium sized sites, local planning authorities should support the development of windfall sites through their policies and decisions. However, paragraph 71 also states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply.
88. The District Plan establishes the principle of including a windfall allowance, which was calculated at 45 dpa during the examination of that Plan. The Council updated its windfall analysis as input to this Plan¹⁵, with detailed checks to ensure no double counting, and applying a discount of 20 per cent to the total completions figure, to be consistent with the 2015 study.
89. It is clear from the updated analysis of small sites completions (1-9 units) that the number of completions has exceeded 100 dpa continuously since 2015/2016, and the increase in the windfall allowance in the Plan from 45 to 84 dpa is a conservative estimate, which is highly likely to be exceeded. I therefore conclude that the increase of the windfall reliance to 84 dpa is realistic.

¹⁵ MSDC Windfall Study Update; July 2020 [Examination Document H1].

Are the qualitative aspects of housing supply sound?

90. The Council argued in its MIQ response¹⁶, that, as this Plan is a 'daughter document' of the District Plan, all sites are required to meet the policy requirements of the District Plan in relation to affordable housing (AH) (policy DP31) and accessible housing (policy DP28), and that the District Plan determined that there is no requirement for student housing in Mid Sussex. I accept that these are not matters within the scope of this Plan.
91. The Council, in its response to the MIQs, states that through its District Plan policy DP30, it is proposing that site SA20 (South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead) may include accommodation for Gypsies, Travellers and Travelling Showpeople. This would contribute to meeting the identified needs set out in the District Plan, alongside the strategic sites allocated in that Plan. The Council's Local Development Scheme sets out that as part of the District Plan Review, a new needs assessment for Gypsy and Travellers and Travelling Showpeople will be undertaken alongside a review of the approach to delivering culturally suitable accommodation. I understand that this work is underway.

Older persons' housing

92. In relation to older persons' housing, the Council's view is that it was not necessary to allocate sites for Use Class C2 (residential institutions, including residential care homes), other than that sought in allocation SA20, because District Plan policy DP30 enables specialist accommodation to come forward; it states that there are no indications of significant unmet need or excess demand within the District; and apart from allocation SA20, no suitable sites have been identified. The Council also explained that work has already commenced on the District Plan Review, which among other things, will focus on specialist accommodation needs for older people.
93. The Council's argument that there are no indications of significant unmet demand appears to be based on its topic paper for housing for older people¹⁷, which stated that there was a surplus of C2 accommodation and no immediate or unmet need for this type of accommodation in Mid Sussex at this point.
94. The recent appeal decision in relation to a proposal for an extra care development of up to 84 units at Albourne (within Use Class C2), plus associated communal facilities and associated development and

¹⁶ MSDC Matter 3- Quantitative and Qualitative aspects of housing provision (except 3.3); 14 May 2021 [Examination Document MSDC-02c (i)].

¹⁷ MSDC: Site Allocations DPD-Housing for Older People Topic Paper; December 2020 [Examination Document TP4].

landscaping¹⁸, however, challenges the Council's position with regard to older persons' housing. It underlines the importance of providing for older persons' housing as set out both in paragraph 62 of *the Framework*, and also in the Planning Practice Guidance, which stresses that the need to provide housing for older people is critical in view of the rising numbers in the overall population. Moreover, these numbers are set to increase significantly in Mid Sussex during the rest of the plan period, with no signs of slowing down.

95. Paragraph 21 of the above appeal decision refers to District Plan policy DP30 (Housing Mix), which states that if a shortfall is identified in the supply of specialist accommodation and care homes falling within Use Class C2 to meet the demands of the District, the Council will consider allocating sites for such uses through a Site Allocations Document. There can therefore be no doubt that the provision of older persons' housing falls within the scope of this examination. Moreover, there have been no relevant material changes in planning policy since the Albourne appeal decision. It is therefore clear to me that, following this decision, the issue of providing specialised accommodation for older people is an important issue which needs to be addressed as a matter of urgency in this Plan.
96. Policy DP30 predicates the requirement of this Plan, considering the need for older persons' housing, on whether a shortfall in the provision of such housing has been identified within Mid Sussex. The Albourne decision not only points to a shortfall in older persons' accommodation in Mid Sussex but also to the fact that the Council's data base is out-of-date, a point the Council conceded at the Albourne Inquiry, especially as 68 extra care units have been demolished since 2014. This takes into account an established tool for assessing the need for specialist housing for older people¹⁹, which identifies an assumed 'provision rate' of 25 units required per 1,000 of the population over 75 years old, or 2.5%. Another paper referred to in the Albourne decision, *Housing in Later Life*, increases the provision rate to 4.5%. Based on the lower rate of 2.5%, this indicates a demand for 386 extra care units in 2020.
97. Although the Council's assessment of extra care housing was set at 73% rent and 27% purchase, I agree with the Albourne appeal Inspector's assessment, that the need in an area like Mid Sussex is more appropriately estimated at about 60% rent and 40% purchase,

¹⁸ Appeal Decision Ref APP/D3830/W/19/3241644 – Site of the former Hazeldens Nursery, London Road, Albourne, West Sussex BN6 9BL, for extra care development of up to 84 units, all within Use Class C2, etc, outline planning permission allowed on 11 September 2020.

¹⁹ Strategic Housing for Older People Analysis Tool (SHOP@) toolkit was used by the Council in its HEDNA (Housing and Economic Development Assessment Addendum, dated August 2016) based consideration of the housing needs of elderly people.

which more accurately reflects the fact that most older people in Mid Sussex are owner occupiers.

98. The evidence submitted by two of the parties with experience in providing for specialist older people's accommodation²⁰, is that there is an identified need for at least 665 additional extra care units (Use Class C2) by 2030, of which 570 should be on leasehold. The Housing and Economic Development Needs Assessment (HEDNA) Addendum (August 2016) identified forecast demand for care homes (Use Class C2) in 2031 at 2,442 bedspaces. Even the Council's requirement for specialist older persons' accommodation, which is calculated at 386 units, is 244 units greater than its existing supply of 142 units.
99. Even the lower figure represents a significant level of unmet need for specialist older persons' housing in Mid Sussex. Policy SA20 is the only site allocation which refers to the inclusion of care homes within its total provision of 550 dwellings. This level of need in the District reinforces the need to address this issue more comprehensively within this Plan and not wait until any District Plan Review.
100. **MM3** introduces a new criteria-based District wide policy to provide for specialist accommodation for Older People and Care Homes within Mid Sussex. This policy would set out the identified need for specialist accommodation for older people and give a clear indication of support for proposals that will contribute to meeting the types of specialist accommodation identified in the HEDNA for Mid Sussex.
101. The new policy also includes key locational criteria, to encourage the provision of older people's accommodation in housing allocations within this Plan or a Neighbourhood Plan (NP), or within strategic allocations, or on sites within built up area boundaries. The policy also sets out sustainability criteria for the development of such specialist accommodation, including being well related to existing development, with appropriate access to or provision of services and facilities, and in locations where there would be the likelihood of reduced reliance on the private car. The policy also requires applications for such accommodation to be accompanied by a Travel Plan.
102. I have resisted requests to make the policy applicable across the District within rural areas away from the edges of built up areas. The requirement for new care homes to be located within sustainable locations is important, not just for the sake of the residents, but also for workers in care homes and visitors, in order to reduce car-based dependence where possible. This is especially important in a District

²⁰ Barton Willmore and Turley, which set out their older persons' housing need statement in Document MSDC-15; 20 September 2021.

which experiences high levels of traffic congestion. There may well be areas within the country where meeting community needs such as housing the elderly may necessitate finding locations beyond existing settlements, as paragraph 85 of *the Framework* states, but in my view Mid Sussex has sufficient opportunities within and on the edge of established settlements for this not to be a necessity for this Plan.

103. The above policy thus sets out a target-based requirement for the Plan to achieve the necessary older persons' dwellings to address the significant shortfall of such accommodation in the District, within a sustainable context, in the interests of the positive preparation and justification of the Plan.
104. Policy SA20, for land to the south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead, whilst it makes provision for housing for older people, fails to indicate any quantitative provision for this use. **MM2** rectifies this lack of positive preparation by introducing a change in the policy to provide for a minimum of 142 older persons' dwellings in a 'care village' in a specific part of the site allocation facing Imberhorne Lane, which will be identified on the Policies Map.
105. I also do not accept the argument that locating older persons' dwellings facing a busy road is unacceptable or insensitive to the needs and expectations of older people. Nor do I accept that the site is unsustainably located in relation to services for older people. Moreover, policy SA20 makes provision for the expansion of local GP services, possibly on-site, or through a Section 106 contribution.

Issue 2 - Conclusion

106. From the evidence before me, I conclude in relation to Issue 2, that, subject to the above modifications, the Plan is positively prepared, justified and effective and is likely to deliver both the quantitative and qualitative aspects of housing provision which are provided for in the District Plan to meet Mid Sussex's requirements over the plan period in accordance with national policy.

Issue 3 - Are the proposed housing site allocations justified and deliverable?

Allocations in and around Burgess Hill

107. The District Plan identifies the town of Burgess Hill as the main focus for new development in the District over the plan period, and to this end it designates two of the four strategic housing allocations on the edge of the town, totalling 3,980 dwellings, plus, at a short distance

away to the west, the proposed STP, which is an allocation in this plan (SA9), for approximately 2,500 jobs. In addition to its strategic housing provision, Burgess Hill is also a focus of the residual housing provision proposed in this Plan. Out of the 1,764 residual housing units allocated in the Plan, 612 dwellings (35%) are proposed on six sites within and on the fringes of Burgess Hill. I assess these sites below.

Policy SA12 - Land South of 96 Folders Lane, Burgess Hill – 40 dwellings; and policy SA13 - Land East of Keymer Road and South of Folders Lane, Burgess Hill – 300 dwellings

108. These two greenfield sites are situated close to each other on the south-east fringes of the Burgess Hill urban area, and they are separated by three small lakes. Site SA12, to the east of the lakes, forms a continuation of a housing development already under construction by the same housebuilder, immediately to the west of the site and the intention is for a shared access onto Folders Lane. Site SA13 is controlled by two housebuilders. Both allocations are important for the Plan, as they comprise a significant proportion of the residual housing total (nearly 20%), closely located to what is regarded as one of the two most sustainable settlements in the District, and all three builders have given strong indications that they intend to fully implement their schemes within the first five years of the plan period. It is probably realistic to assume that a proportion of allocation SA13 would be delivered in years 6-10, as set out in the Council's Updated Housing Land Supply Trajectory²¹.

Highways

109. Regarding traffic impact on the surrounding highways network, concerns were expressed in particular on the cumulative impacts of the two allocations on highway safety and congestion on the Burgess Hill morning peak in the south-eastern parts of the town. The Station Road railway bridge was identified by some as the choke point, together with congestion already experienced at several other locations, such as at the Keymer Road/Folders Lane junction. Concerns were also expressed regarding the impact of the proposed development on the road between Burgess Hill and the rural settlements of Hassocks and Keymer, to the south.

110. The Systra traffic model used to inform the Plan has been accepted as fit for purpose by WSCC (the local highways authority) and has been validated by National Highways (formerly Highways England), and I see no grounds from evidence submitted at the examination to pronounce this model to be flawed. WSCC clarified that the Systra

²¹ Examination Document MSDC-06b.

study methodology also included the impact of planning commitments within its reference case.

111. Whilst the local highways authority confirmed that the Keymer Road/Folders Lane junction would operate at overcapacity in the '2031 plus committed development' scenario, and whilst queue length and waiting time would increase, its critical finding is that the traffic impact arising from policy SA12 and SA13 would not be 'severe'. This finding is important, bearing in mind that national policy, as expressed in paragraph 111 of *the Framework*, states that: "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*". Indeed, the application of whether the highways impact would be 'severe', was debated fully during the examination hearings, and is dealt with in some detail in the Council's Matter 6 statement in response to the MIQ questions²².
112. The local highways authority has already considered a withdrawn planning application for a similar scheme on the SA12 allocation site and raised no highways objections in relation to the proposed quantum or access arrangements for this development. Also, no objection has been raised by the local highway authority in relation to the development proposed for Site SA13.
113. The SA13 developers have also commissioned a Highways Appraisal²³ which demonstrates that the site access from Keymer Road could be suitably widened and extended into the allocation and could cater, in capacity and safety terms, for the additional dwellings proposed for policy SA13. The Appraisal also demonstrates that there would be adequate provision for pedestrians and cyclists and that emergency access would be achievable. Although a bus service accessing from within the site is not envisaged, the Appraisal notes that the development would provide material contributions towards improved bus infrastructure, both at the bus stops on Keymer Road and Folders Lane, and at Burgess Hill Station.
114. The highways evidence from WSCC and the scheme promoters also points to scope for increasing the sustainable mode share of traffic generated by the proposed development at sites SA12 and SA13, which are located on the edge of one of the most sustainable settlements in Mid Sussex. In particular, these sites are located within easy walking distance of the town's railway station which has

²² MSDC: Site Allocations DPD: Matter 6 – Transport, Infrastructure, Implementation, Modelling; 14 May 2021 [Examination Document MSDC-02f].

²³ Odyssey: Highways Appraisal, Keymer Road, Burgess Hill; July 2020 [Examination Document SA13.4].

frequent train services to London, Brighton and several other towns in Sussex.

115. The sites are also relatively close to Burgess Hill town centre, schools and a range of other community facilities and services. Moreover, there is realistic potential to introduce footpaths, cycleways and bus service improvements to serve these developments, which the scheme developers aim to implement. Another significant consideration is that, if policies SA12 and especially SA13 were deleted from the Plan, it is highly unlikely that a similar quantum of housing development could be located within an equally sustainable location within Mid Sussex.
116. The highway authority's estimate of a likely switch to a more sustainable mode share as a result of the developers' proposals was put at 1.5%, based on evidence included in the Mid Sussex Transport Study (MSTS). Moreover, the highways officers at the examination hearings stressed that this was a conservative estimate.
117. In summary, in relation to traffic impact, the sustainable location of the two sites on the edge of Burgess Hill, close to the town centre, employment opportunities, main services, railway station and bus routes, coupled with the Systra study finding that these developments would not result in unacceptable, 'severe' traffic congestion, together with the likely switch of the order of at least 1.5% to a more sustainable mode share of the traffic generated by the two allocations, amount to a compelling argument in support of these allocations within the Plan.
118. Policies SA12 and SA13 both require a strategy to provide sustainable transport infrastructure, which, among other things would demonstrate how the developments would integrate with the existing highways network and provide safe and convenient routes for walking, cycling and public transport to serve the development.
119. Given these findings, alongside my findings on related issues under Issue 6 later in the report, I consider that policies SA12 and SA13 are sound in relation to highway matters.

Character and appearance

120. In terms of the impact of the developments on the setting of the SDNP, the South Downs National Park Authority (SDNPA) has indicated at several stages in the formulation of the Plan, that both allocations SA12 and SA13 would erode the rural buffer between Burgess Hill and the SDNP, with the implication that this would be harmful to the character and appearance of the National Park itself.

However, the SCG signed between the Council and SDNPA²⁴, and the recent SCG signed by these two parties and also by the potential developers²⁵, state that the parties agree that both sites are able to accommodate some development without harming the National Park.

121. The SDNPA indicates in the SCGs that its concern is principally with regard to allocation SA13, and I agree with this view. The SDNPA also accepted at the examination hearings that both Sites SA12 and SA13 could accommodate some development without harmful impacts on the setting of the National Park.
122. In terms of close impact on the National Park, neither allocation abuts the SDNP boundary, and although they both occupy countryside to the south of the built up area of Burgess Hill, neither is located within land which has a formal landscape designation in any development plan. All parties, however, agree that the character of the countryside in the vicinity of the two allocations, which is identified as part of the Low Weald, is considered to be visually attractive, with multiple hedgerows and trees, historic field patterns and a relatively undisturbed, gently undulating topography.
123. The closer of the two allocations to the SDNP, at site SA13, lies some 139m away from the nearest National Park boundary to the south of Wellhouse Lane, whilst site SA12 is located 185m away from the nearest National Park boundary to the south-west, and is 211m away from the boundary from a point due south. The relationship between allocation SA13 and the National Park boundary is also significant because Wellhouse Lane runs to the south of a line of dwellings, which in their maturely landscaped setting, would effectively form a low density visual barrier between the proposed development and the edge of the National Park.
124. It is critically important that all relevant authorities, including Mid Sussex District Council (MSDC), are required to have regard to the purpose of the SDNP. This is set out in Section 62 of the Environment Act 1995, which states that the first purpose of the National Park is: "*to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*" The SCGs referred to above demonstrate that their signatories are committed to ensuring that all new development respects the setting of the SDNP, and to this end, they demonstrate that the parties have worked together to make policies SA12 and SA13 more sensitive to their potential impact on the SDNP and to introduce more effective mitigation than they were hitherto.

²⁴ SCG-Update to Memorandum of Understanding January 2016 and SCG 2018 between MSDC and SDNPA, dated 7 August 2020 [Examination Document DC11].

²⁵ Document MSDC-20 SCG in relation to SA12 and SA13; 12 October 2021.

125. In order to minimise impact on the setting of the National Park, the following changes at the Regulation 18 and 19 consultation stages have therefore been introduced:
- In relation to both policies SA12 and SA13 - Inclusion of reference to the setting of the SDNP in both policies; and inclusion of a requirement for any external lighting scheme to be designed to minimise light spillage to protect dark night skies in both policies.
 - In respect of policy SA13 – Locate lower density development towards the southern end of the allocation to reflect the existing settlement pattern; ensure the design and layout works with the natural grain of the landscape; and substantially enhance the landscape structure and respect historic field boundaries with native tree planting throughout the layout to contain the new housing and limit the impact on the wider landscape.
 - In respect of policy SA GEN - include a specific requirement outlining the importance of a landscape-led approach for development.
126. These requirements of policies SA12 and SA13 significantly reduce their impact on the surrounding landscape and are necessary for the positive preparation and justification of the Plan.
127. The SCGs also explain that a number of landscape appraisals, including a Landscape and Visual Impact Assessment (LVIA) have been undertaken, to inform site layout, capacity and mitigation requirements, and that the undertaking of LVIA is a requirement of both policies SA12 and SA13. In summary, LVIA's have been produced on the instructions of the site promoters for SA12 and for SA13, as well as a report commissioned by MSDC²⁶, which is more high-level than a 'mainstream' LVIA, but nevertheless is considered to follow the SDNP's Sensitivity and Capacity Guidelines.
128. I agree with the opinion expressed by the Council and the site promoters that the report for Mid Sussex District Council provides an indication of the scale of development that could be acceptable in terms of landscape and visual character on all or part of a site and assesses the level of landscape suitability that would apply to that scale of development. I also consider that sufficient and proportionate evidence has been prepared and submitted to the examination in relation to both the principle of the two allocations and the housing yields proposed.

²⁶ LUC: Mid Sussex District SHLAA: Review of Landscape and Visual Aspects of Site Suitability; January 2015.

129. The most recent SCG²⁷ also includes an Opportunities and Constraints Plan (OCP), which sets out in some detail the principal sensitivities of site SA13 in relation to the setting of the SDNP, recognising that these sensitivities increase towards the south of the site. In order to ensure policy SA13 is in line with the need to respect these sensitivities, **MM4** includes a reference in the policy to the principal findings of the OCP, which a future LVIA at the planning application stage will need to refer to. This modification is necessary for the positive preparation of the Plan in such a critically sensitive area and taking account of the requirement in paragraph 176 of *the Framework*, which draws attention to the need for development within the setting of National Parks to be sensitively located and designed to avoid or minimise adverse impacts on these areas.
130. I note that several representations refer to the need for the landscape sensitivities of the site to be understood before the layout is finalised. I am satisfied that policy SA13, together with the requirement in **MM4** to incorporate the findings of the OCP and the LVIA, will ensure that the final layout on allocation SA13 will be genuinely landscape-led.
131. Concern has been expressed that the 300 dwelling total proposed for SA13 is too high to enable the required degree of landscape integration to minimise harm to the adjacent landscape. However, allocation SA13 could accommodate around 450 dwellings, at a density of around 30 dph. It could have yielded an even greater dwelling total, given that the LUC classification of development yield extends to 50 dph for medium density developments, if the principal criterion had been to make the most efficient use of land in a typical suburban development, which itself is a national policy objective. The proposed density of 19.73 dph for allocation SA13, i.e. at a significantly reduced density, is classified as within the LUC 'low-medium' density classification, which gives a strong indication that the allocation has been prepared along landscape-led principles.
132. Concern has also been expressed that allocations SA12 and SA13 extend the urban area into open countryside and erode the rural gap between Burgess Hill and the smaller settlement of Keymer. It is an axiomatic point, however, that any development which extends the urban area of a settlement into hitherto open countryside will by its very nature have some impact on the character of the land it is extending into; at the least, rural land will become urban. This cannot, however, be an argument on its own to stop the incremental development of settlements, especially in view of the national objective, as set out in paragraph 60 of *the Framework* of significantly boosting the supply of homes.

²⁷ Examination Document MSDC-20.

133. What does matter, however, is whether such development on the edges of towns such as Burgess Hill, is intrinsically harmful in terms of its visual impact. I have explained above that I do not agree that it is harmful, subject to the above-mentioned modification, that this is the case here and that policies SA12 and SA13 address this issue in a proactive and sensitive way.
134. Clearly, the length of the gaps between Burgess Hill and Keymer and Ditchling will be reduced by the implementation of policies SA12 and SA13, but a pronounced gap still remains, and there is no merging of settlements resulting from these two allocations. As the Lizard study points out in relation to SA12, the wooded character of the landscape means that there is no obvious perception of the proximity of the settlements, and the same conclusion can be drawn in relation to SA13.
135. Concerns were expressed that none of the above mentioned visual assessments have addressed the impact of the two allocations on the setting of the National Park, as now required in paragraph 176 of *the Framework* (July 2021 version). However, the CSA study in relation to SA13 refers specifically to the setting of the SDNP at the end of section 4, concluding: *"In terms of the Site, there is no inter-visibility from within it (i.e., site SA13) to the nearby edge of the SNDP, owing to the densely vegetated intervening land... As a consequence, the Site itself plays a very limited role in contributing to the setting of the SDNP"*. From my own observations, both from locations in the intervening area between the allocations and the SDNP boundary, and from further afield, within the SDNP, I concur with the CSA study conclusions.
136. Furthermore, the Lizard study shows both allocations lying within a ridgeline which acts as a visual barrier from public viewpoints in the SDNP to the south. It refers to the LUC landscape study, commissioned by the Council for its Strategic Housing Land Availability Assessment (SHLAA) work, to inform the Council's housing strategy as input to the District Plan. The LUC study divides the relevant area of SA12 (SHLAA site 534) into three parts. Most of the allocation falls within one of these parts (Area B), which is considered to be of medium landscape suitability, accommodating a low-medium housing yield, whilst the southern part (Area A), approximating to a third of the site, is of low-medium landscape suitability, which could accommodate a medium-high housing yield.
137. Although the overall housing density of the allocation, at 23.25 dph, would fall just above the LUC classification of low-medium density (identified as 7-20 dph), the site has a well treed landscape including robust hedges and field boundaries. These features would ensure that a sensitively planned development, as required in policy SA12, would

not materially harm the character and appearance of the setting of the National Park in this locality.

138. Both allocations, however, are located some distance from the principal public viewpoints on higher ground on the main chalk ridge in the South Downs, such as at the Jack and Jill windmills at Clayton. Although conditions were cloudy on my accompanied site visit to this spot, the local landmark of Oldland Mill, a distinctive white windmill, was visible in the middle distance. I found this to be a useful reference point, about 3 km to the north/north-east of the Jack and Jill windmills. The overall impression, viewing to the north/north-east at this distance, is of a generally wooded area with buildings dotted in the landscape, especially associated with the small settlements of Keymer and Ditchling. It is not, however, a pristine, development-free landscape.
139. Sites SA12 and SA13 lie approximately 1.5 km further to the north of Oldland Mill, where any development would be set in the context of the town of Burgess Hill, forming an urban backdrop almost immediately to the north of the proposed allocations. It is clear from the above mentioned landscape studies at the proposed densities, and subject to the layouts being informed by the design and landscaping schemes required by both policies SA12 and SA13, including mitigating light spillage to protect the dark night skies and protecting the tranquillity of the area, that the proposed developments would not materially harm the setting of the SDNP. I also consider that they would merge with limited visibility into their immediate context when viewed from 5 km away on the South Downs, with effective screening from existing and proposed trees and from nearby properties.
140. In summary, on the basis of the above considerations, I consider that the visual impact of allocations SA12 and SA13 on the character and appearance of both the nearby countryside area and also on the setting of the SDNP, whether from nearby or further afield, subject to the above modification **MM4**, would not be harmful. This amounts to a further strong argument in support of their allocations within the Plan, both in principle and in terms of their proposed quantum of development.

Ecology

141. Several additional concerns were expressed in representations regarding policies SA12 and SA13. In relation to impact of the allocations on the ecology of their respective sites, I note that the Preliminary Ecological Assessment²⁸ for SA12 identifies the site as

²⁸ Lizard Ecological Appraisal Survey of Site SA12; June 2020 [Examination Document SA12.6].

semi-improved grassland with no rare or unusual plant species recorded. The assessment states that any loss of diversity could be compensated with a native planting scheme and suitable habitat creation areas to the landscape buffer areas to the site's boundaries.

142. Policy SA12 sets out a sustainable framework to ensure development will conserve and enhance areas of wildlife and ensure there is a net gain to biodiversity overall. I consider that the ecological assessment enables policy SA12 to achieve the sustainable framework which is outlined above.
143. In relation to allocation SA13, the Ecological Deliverability Report states that it is considered that there are no over-riding ecological constraints to development of the site, and that the proposed development could deliver biodiversity gain overall, in accordance with paragraphs 170, 174 and 175 of *the Framework* and policies DP37 and DP38 of the District Plan.²⁹ The report also states that in addition to habitat protection and avoidance, habitat creation and enhancement could be delivered, providing a net gain in species-rich hedgerow, broad-leaved woodland, wetlands (including ponds) and wildflower meadow.
144. On the basis of the evidence before me, I conclude that both allocations SA12 and SA13 can mitigate any ecological impact to an acceptable level.

Conclusion for allocations SA12 and SA13

145. Overall, I have considered highways and traffic impact, and impact on both character and appearance and ecology, and from assessing the overall sustainability considerations in relation to these sites, I conclude that, subject to the above modification, both allocations SA12 and SA13 are sound.

Policy SA14 - Land to the South of Selby Close, Hammonds Ridge, Burgess Hill - 12 flats plus community use

146. This urban site within Burgess Hill has good access to the town's facilities and services. As a flatted development on brownfield land, this is potentially an unviable site where the Benchmark Land Value (BLV) exceeds the residual value, which itself is a negative amount. The advice in the independently commissioned Viability Review³⁰ is that the Council should be cautious about developing sites such as SA14.

²⁹ EAD Ecology: Ecological Deliverability Report for Keymer Road, Burgess Hill; July 2020 [Examination Document SA13.2].

³⁰ HDH Planning and Development Ltd: Site Allocations Document – Viability Review; September 2019.

147. Despite its poor viability, however, the Council, as landowner, expressed confidence that it would develop the site during the plan period, and the Viability Review advises that the current development environment in Mid Sussex is an active market in a relatively high value area, and the report expects that sites of this type (brownfield, flatted development) would be deliverable. The Council also stated that Southern Water does not have infrastructure crossing the site³¹, contrary to the perception of several developers and agents, the presence of which could have been a key factor affecting its land value.
148. Clearly, more work is needed to ensure the site is deliverable, including securing a detailed vehicular access, which could be achieved through the extension of the allocation up to the boundary with the existing properties to the north-east [MM19], which would be in the interests of the effectiveness of the Plan. Also, the proposed development, including the community facilities, and the provision of a layout that would safeguard the existing trees covered by a Group Tree Preservation Order to the south-west of the site (as stipulated in the explanatory text), would amount to a sustainable asset. Subject to the above modification, I consider allocation SA14 to be justified and effective, and that the allocation could be delivered in years 6-10 of the plan period.

Policy SA15 Land South of Southway, Burgess Hill – 30 dwellings

149. This urban site within Burgess Hill enjoys good access to the town's facilities and services. It comprises a substantial section of overgrown woodland as part of an area designated as a Local Green Space (LGS) in the Burgess Hill NP. The existing open space is privately owned. It is likely to have some wildlife and visual value, although no evidence was presented as to how important it is in wildlife terms and it has no statutory wildlife or landscape designation as such. Whilst noting the existing LGS designation of the site, the nature of the open space cannot, in my view, be described as accessible, and I am unconvinced regarding the claim that the site functions as an important resource for the people of the town. Consequently, I am content that it is appropriate for policy SA15 to supersede the LGS designation, as shown on the Plan's supporting policies map.
150. The policy would open up the north-west part of the site for housing, and provide accessible open space on the eastern part, so that some of the site for the first time would be accessible to the public. The policy includes the retention of the existing footpath separating the

³¹ Evidence given by the Council on Day 4 of the examination hearings. Also, see Document C1 (Reg 22 Statement of Consultation) – Appendix 9: Summary of Responses (Regulation 19) – Policies (page 36).

two parts of the site. I note that the site forms part of an extensive system of open space, some of which is used for outdoor sports and which functions as an urban lung for Burgess Hill.

151. The site, which passes the viability assessment in the above mentioned Viability Review, is in single ownership and no constraints to implementation were raised. Vehicular access would be possible from the west. I therefore consider allocation SA15 to be justified and effective and that it could be delivered within years 1-5 of the plan period.

Policy SA16 - St Wilfrid's Catholic Primary School, School Close, Burgess Hill - 200 dwellings

152. This site is in a central urban location, well served by public transport. It is the largest urban redevelopment site in the District. Although the policy provides for 200 dwellings, the latest housing estimates are for 200 units on the school site and an additional 100 units, elsewhere as part of a comprehensive development scheme, and **MM17** clarifies this point, in the interests of the positive preparation of this key brownfield site within Burgess Hill. There are several existing uses, and this is a challenging site to deliver, and I note the concerns expressed over deliverability within the plan period. The Viability Report identifies the site as unviable, with the residual land value falling some way short of the BLV.

153. However, the Viability Report figures³² need to be placed in the following context: Firstly, there is a pressing need to relocate the school, which was described at the hearings as "*getting close to not fit for purpose*"³³. The aim of the Diocese is to create a campus to accommodate both the relocated St Wilfrid's school and the nearby secondary school (St Paul's Catholic College). It would be unrealistic and inappropriate for the Plan to ignore this strong community driver.

154. Secondly, WSCC is leading on the master planning work for this site, work that is ongoing and which has already secured design and feasibility work funding, again indicating seriousness of intent and realistic expectation. This amounts to a strong agenda to move this redevelopment proposal forward.

155. Thirdly, it was reported at the hearings and subsequently confirmed by the Council in its update³⁴, that the yield is now anticipated in the region of 300 units, 100 of which are already committed within the

³² See Table 5.4 in the Viability Report.

³³ Evidence given by the Council on Day 4 of the examination hearings. See also MSDC-07 Appendix 1.

³⁴ MSDC-07 Response to Action Point 5 – Matter 3.3: St Wilfrid's Catholic Primary School, School Close, Burgess Hill; 5 August 2021.

'made' NP. This should significantly enhance the residential land value of the site from the figure in the Viability Report.

156. The policy is also in accordance with Burgess Hill NP's policy TC3 for the Brow Area of the town and the Council has indicated that there are no significant infrastructure requirements which amount to 'showstoppers' which could impact on the deliverability of the site³⁵. WSCC has indicated that no highway access issues have been identified in the Strategic Transport Assessment (TA), and a detailed TA will be required at the planning application stage to ensure highway safety including safe access is achieved to serve the new site. Surface water run-off is to be minimised, incorporating Sustainable Drainage Systems (SuDS), to ensure that flood risk is not increased. Any contamination is required to be addressed in the policy.
157. On the basis of the above matters and subject to the proposed modification, I consider that policy SA16 is sound and that the housing in the allocation could be delivered in years 6-10 of the plan period.

Policy SA17 - Woodfield House, Isaac's Lane, Burgess Hill – 30 dwellings

158. This site is situated in open countryside to the north-west of Burgess Hill, but it would be located on the edge of the built up area of the town once the Northern Arc Strategic Site is completed, which will border it on three sides. The site has no significant infrastructure requirements or access difficulties, and it lends itself to being landscape led. It will have good access to services once the Northern Arc has been completed. For the above reasons I consider policy SA17 is sound. The allocation could be delivered in years 1-5 of the plan period.

Allocations in and around East Grinstead

159. The town of East Grinstead is one of the three Category 1 towns identified in the District Plan to function as a principal focus for new development over the plan period, and to this end the Plan designates three housing allocations within and on the edge of the town, plus three additional allocations in nearby villages, totalling some 864 dwellings. I assess these sites below.

Policy SA18 - Former East Grinstead Police Station, College Lane, East Grinstead – 22 dwellings

160. This small urban site within the town of East Grinstead has a parkland setting and has no significant infrastructure requirements. Allocation

³⁵ MSDC Response to Matter 3.3 – Quantitative and Qualitative aspects of housing provision; 14 May 2021 [Examination Document MSDC-02c (ii)].

SA18, for 22 dwellings, has a safe and secure access, and enjoys close proximity to a comprehensive range of employment opportunities, services and facilities. A reinstated police station could be provided elsewhere in the town if the need arises in the future, although the police authority is keen to develop the site for housing. On the basis of the above evidence, I consider it is a sound allocation, and the housing could be delivered in years 6-10 of the plan period.

Policy SA19 - Land South of Crawley Down Road, Felbridge – 200 dwellings

161. This allocation for 200 homes is located just over the border from the village of Felbridge in the neighbouring District of Tandridge in Surrey and would form an extension to this village. The TA for this allocation³⁶ commissioned by the site promoters indicates a satisfactory traffic audit. It is located on a bus corridor with a regular service to East Grinstead railway station and the town centre facilities and services, with plans for increased frequency and real time information at bus stops and some form of bus priority, possibly at key junctions. The site is also located less than a ten minute walk to the nearest school.
162. Concerns were expressed about both this allocation and the larger SA20 allocation (see below) that they might add to the alleged unacceptable, cumulative impact on the highway network in and around East Grinstead, and in particular on the busy A22, including the A22/A264 Felbridge junction. I heard at the hearings that appropriate opportunities to promote sustainable transport modes are being taken up by the scheme developers, supported by the local highways authority (WSCC) in relation to both allocations, and that safe and suitable vehicular access to these allocations can be achieved, with opportunities for cost effective mitigation.
163. Critically, paragraph 111 of *the Framework* sets a high bar to refusing development on highways grounds and indicates that residual cumulative impacts on the road network would need to be demonstrated as 'severe' for refusal to be justified.
164. The Systra traffic model evidence presented to the examination by WSCC, shows a worst case scenario when the impacts of allocations SA19 and SA20 are factored in. Also, the projected increases in traffic volume are not shown in the traffic model to be 'severe', whilst the traffic count figures on the A22 at Felbridge show a slight decrease in traffic from 2007 to 2019, with little change in numbers since then³⁷.

³⁶ Examination Document SA19.6.

³⁷ Evidence given on observed traffic count figures on the A22 between Felbridge junction and Imberhorne Lane junction over the period 2007-2019 by Guy Parfect from WSCC at the examination hearing session on Day 6 (11 June 2021).

Moreover, Systra's projected modal shift shows a small but positive increase in bus use, of around 2% on the A22, based on the measures planned to increase bus frequency on the A22 as referred to above.

165. A more general concern, levelled against both the main housing allocations in the East Grinstead area, is that the strategy is unbalanced, given that there is no corresponding employment land provision, implying that the Plan does not provide for a sustainable housing/employment balance in the north of the District. However, this area is within easy commuting distance of a wide variety of employment opportunities in Crawley, including Gatwick Airport, whilst the STP (considered in more detail later in this report) is projected to provide a significant number of high value jobs for the entire District and beyond.
166. I therefore consider that allocation SA19 is in a sustainable location on a bus corridor, and although the A22 is a busy main road, it is not deemed by the traffic modelling to be 'severe', whilst sustainable transport measures are likely to result in increased modal shift towards buses. The indicative phasing points to scheme implementation within years 1-5, although I note that the Council's updated housing land supply trajectory³⁸ indicates that the final 90 dwellings are forecast for delivery in 2026/27 and 2027/28. I am satisfied from the evidence submitted to the examination that the Council's trajectory in relation to policy SA19 is realistic.

Policy SA20 - Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead – 550 dwellings

167. This allocation for 550 dwellings is located immediately to the west of the urban area of East Grinstead. As policy SA20 states, its objective is to deliver a high quality and sustainable extension to the town, which is informed by a landscape led masterplan. This large site has the potential to provide not only a significant amount of housing, including a specific allocation of a minimum of 142 older persons' dwellings in a 'care village' (see **MM2**), but it also has the capacity to deliver additional early years and primary education, play space to serve the wider community and strategic Suitable Alternative Natural Greenspace (SANG), to attract people away from the nearby Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) (See Issue 4 for consideration of the management of the SANG).
168. This allocation, therefore, would deliver important public benefits for both East Grinstead and the wider area. Moreover, the site is in close proximity to a range of community facilities and services, as well as

³⁸ Examination Document MSDC-06b.

being less than 1.5 km from East Grinstead town centre. On the basis of the evidence before me, I consider the site to be highly sustainable.

169. Although concerns were expressed over the ease of a land swap between WSCC and the farm owner, to enable the consolidation of the school campuses and playing fields, as well as to provide for an additional vehicular access to the allocation, the SCG between WSCC and the developers³⁹ sets out clearly how this will be achieved, with the Heads of Terms already having been agreed. I therefore do not regard the difficulties of this land swap as being insurmountable or even sufficiently serious as to significantly delay implementation.
170. The principal parties have demonstrated in the SCG that the important elements of vehicular access and education provision can be delivered, following the delivery of the new playing field land. I also note that the SCG is supported by the neighbouring Surrey County Council in relation to highways improvements and educational provision, with commitment to joint working to achieve these objectives during the plan period. Clearly, joint working is key to the successful implementation of this large scheme within the plan period.
171. As with the nearby allocation SA19, the impact of the scheme on the local highway network was debated at some length at the hearings. The Transport Appraisal for this allocation⁴⁰ commissioned by the site promoters, shows that the vehicular access arrangements are considered acceptable by WSCC, the local highway authority, and that the proposed highways improvement schemes would provide a strategic benefit to the highway network in and around East Grinstead (and in particular the operation of the A22). It is consistent with the findings of the Mid Sussex Transportation Study (MSTS) based on Systra, which has been validated in line with DfT's criteria and is therefore considered fit for purpose to assess the impact of developments identified within the Plan.
172. In addition to vehicular access, the scheme provides for multiple pedestrian access points and a direct cycle route to the town centre. The above mentioned transport appraisal also shows details of nine local bus services, which connect the site with East Grinstead Railway Station, the town centre, Crawley and other destinations in Sussex and Surrey. Finally, the appraisal shows details of how the existing Public Rights of Way within and around the site would be enhanced as part of the proposals for policy SA20.

³⁹ SCG between WSCC and Welbeck Strategic Land LLP for Land South and West of Imberhorne Upper School, East Grinstead; June 2021 [Examination Document SA20.2].

⁴⁰ Imberhorne Farm, East Grinstead: Transport Appraisal by Pell Frischmann; 17 July 2020 [Examination Document SA20.4].

173. I therefore consider that, subject to the above modification, policy SA20 is positively prepared, justified, effective and reflects national policy. Although the Council's updated trajectory⁴¹ indicates that most of the delivery will take place in years 6-10, I am satisfied from the evidence before me that a start will be made within years 1-5 and that there is a good prospect of the entire scheme being delivered within the plan period.

Policy SA22 - Land North of Burleigh Lane, Crawley Down – 50 dwellings

174. This allocation for 50 dwellings is located on the southern edge of the settlement of Crawley Down. Concerns were expressed regarding the uncertainty of vehicular access, and associated with this, whether its delivery within the plan period was a realistic prospect. Clearly, without certainty of delivery, this policy would not be effective and would therefore be unsound. A SCG between MSDC and the site promoter⁴² was submitted following the hearings to address this issue. It states that the preferred access is via Sycamore Lane and that the site promoter is actively progressing the solutions needed to gain control over the land required for access and is aiming to finalise any relevant agreement(s) by February 2022. On this basis, the SCG commits implementation of the development proposals for the site to a start in October 2023 with completion by August 2025.

175. On the basis of the SCG, modification **MM21** specifies the preferred vehicular access to be via Sycamore Lane, with failure to secure this meaning that the policy fails the test of effectiveness and therefore should be deleted from the Plan. Subject to the above modification, I consider the policy to be sound. Although the indicative phasing in the submitted Plan is for delivery in years 1-5, I consider that, in the light of the access issue referred to above, the Council's updated trajectory, which delays anticipated delivery until years 6-10, is more realistic.

Policy SA26 - Land South of Hammerwood Road, Ashurst Wood – 12 dwellings

176. This allocation for 12 dwellings is located in a small village, which is a category 3 settlement, within the High Weald AONB. The policy sets out robust requirements to ensure that any impact of the development on the AONB to the north and the wider countryside will be effectively mitigated, and **MM8** ensures that the policy includes the requirement to conserve and enhance the landscape of the AONB, in line with national policy.

⁴¹ Examination Document MSDC-06b.

⁴² SCG between MSDC and Merrow Wood: Proposed Allocation SA22 – Land North of Burleigh Lane, Crawley Down; August 2021 [Action Point 12].

177. There are no significant infrastructure issues in relation to the development of this site for housing, and I consider the policy to be sound. The indicative phasing is for delivery within years 6-10, which on the basis of the evidence seems to be realistic.

Policy SA32 - Withypitts Farm, Selsfield Road, Turners Hill – 16 dwellings

178. This allocation for 16 dwellings is on a farmstead adjacent to the village of Turners Hill, which is a category 3 settlement. The redevelopment scheme would incorporate several existing, historic buildings as part of the overall scheme. There are no significant infrastructure issues and, subject to the provisions of policy SA32, this minor development in the High Weald AONB would not result in a significant impact on the quality of the landscape. The policy requires a LVIA, which will ensure any impact is not harmful to the AONB. Although the site is located within the Brick Clay (Wadhurst Clay) and the Building Stone (Ardingly and Cuckfield) Mineral Safeguarding Areas, this is not viewed as a binding constraint which might challenge the soundness of the policy, and for all the above reasons I consider the policy to be sound. I have no reason to question the indicative phasing in the submitted Plan for delivery to take place in years 6-10.

Allocations around Haywards Heath

Policy SA21 - Rogers Farm, Fox Hill, Haywards Heath – 25 dwellings

179. This allocation for 25 dwellings is to the south of the town of Haywards Heath in open countryside, but it is sufficiently distant from Burgess Hill not to compromise the integrity of the strategic gap between the two towns. The site has no landscape policy designation, and it also has little ecological value. Policy SA21 requires the retention and enhancement of mature trees along the boundaries of the site, so as to minimise any impact on landscape and heritage assets to an acceptable level. There are also no significant infrastructure requirements, and highways impact related to the policy is not considered to be significant.

180. As with other allocations on greenfield sites on the edge of settlements, such as at allocations SA12 and SA13, it is axiomatic that any development which extends the urban area of a settlement into hitherto open countryside will, by its very nature, have some environmental impact; at the least, rural land will become urban. This cannot, however, be an argument on its own to stop the incremental development of settlements, especially in view of the national objective, as set out in paragraph 60 of the Framework of significantly boosting the supply of houses. This is also the only site proposed for

housing at Haywards Heath, which is one of the three principal settlements in the District.

181. On the basis of the above considerations, I conclude that policy SA21 is sound, and I have no reason to doubt the indicative phasing in the submitted Plan for delivery in years 1-5.

Policy SA23 - Land at Hanlye Lane to the East of Ardingly Road, Cuckfield – 55 dwellings

182. This allocation for 55 dwellings is located immediately to the east of the category 2 village of Cuckfield which has a wide variety of services and facilities. A SCG between the site promoters and the Council⁴³ underlines the willingness of the site promoters to bring the site forward for residential use in accordance with the requirements of policy SA23.
183. Although the site lies close to the High Weald AONB, there are no landscape designations covering the site itself. The site is physically separated from the wider AONB landscape to the north by its existing well vegetated framework. The policy sets out robust requirements to ensure that any impact of the development on the AONB to the north and the wider countryside is effectively mitigated, and **MM7** ensures that the policy includes the requirement to conserve and enhance the setting of the AONB, in line with national policy.
184. The southern field adjacent to the allocation is to be retained as public open space, and the policy requires a minimum buffer of 15m between the development and the adjacent Horsegate Wood ancient woodland, close to the south-east corner of the site.
185. I agree with the Council that, with the above provisions in place, it is not necessary to reduce the number of dwellings from 55 (33.3 dph) in the submitted allocation to around 20-30 dwellings (12-20 dph), as advocated by some parties at the hearings, including the Parish Council. On the basis of the above considerations, I conclude, subject to the above modification, that policy SA23 is sound, and I have no reason to doubt the indicative phasing in the submitted Plan for delivery in years 1-5.

Policy SA31 - Land to the rear of Firlands, Church Road, Scaynes Hill – 20 dwellings

186. This allocation for 20 dwellings is located at the north-eastern end of the village of Scaynes Hill, which is a category 3 settlement offering

⁴³ SCG between Glenbeigh Developments Ltd and MSDC covering SA23 Land at Hanlye Lane, Cuckfield; 24 May 2021 [Examination Document SA23.8].

some key services. The site lies immediately behind a line of residential properties at Firlands and vehicular access to the side of the Firlands properties has now been secured. **MM18** makes provision for a dedicated pedestrian route into the village to an acceptable highway authority standard and is necessary in the interests of pedestrian safety and the positive preparation of the Plan.

187. Concerns were expressed in relation to restrictive covenants on the site. The Council explained, however, that the extent of these covenants amounted to only 0.6 ha out of a total of 2.2 ha covering the entire site, and the Council is confident that the scheme can be implemented without affecting the area controlled by the covenants. On this basis, and subject to the above modification, I conclude that policy SA31 is sound. The indicative phasing set out in the submitted Plan for delivery within years 1-5 appear to me to be realistic.

Policy SA33 - Ansty Cross Garage, Cuckfield Road, Ansty – 12 dwellings

188. This allocation for 12 dwellings involves the redevelopment of a commercial garage and car parking area in the centre of the small village of Ansty, which is a category 4 settlement. There is a single convenience store nearby. A wide range of facilities and services, however, are available at Haywards Heath, just 3 km away. Paragraph 120 (c) of the Framework states that in order to make effective use of land, substantial weight should be given to the value of using suitable brownfield land, such as this site. A phase 1 contamination assessment will be required in order to implement the allocation.

189. I therefore consider this allocation to be highly sustainable and conclude that policy SA33 is sound. Its indicative phasing in the submitted Plan of delivery within years 6-10 would appear realistic in view of the need for redevelopment and contamination assessment.

Other Allocations

Policy SA24 - Land to the North of Shepherds Walk, Hassocks – 130 dwellings

190. The allocation is for 130 dwellings, located to the north of Hassocks, which is a local service centre (Category 2 settlement), and which is also the location for one of the four strategic allocations provided for in the District Plan, North of Clayton Mills, for 500 dwellings. Delivery doubts relating to an alleged access ransom strip were raised in representations and at the hearing sessions, but no robust evidence on this was forthcoming. WSCC as local highway authority has

concluded that the proposed development would not have a 'severe' impact on the local highways network, and the site is within relatively easy walking distance to rail and bus services and local facilities and is therefore highly sustainable.

191. Flood risk will need to be managed in a sustainable way, which may impact on delivery until years 6-10 of the plan period. On the basis of the above evidence, I conclude that policy SA24 is positively prepared and justified.

Policy SA25 - Land West of Selsfield Road, Ardingly – 70 dwellings

192. This allocation for 70 dwellings in the submitted Plan is located within the village of Ardingly, which is 'washed over' by the High Weald AONB. National policy, as expressed in paragraph 176 of *the Framework*, requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of national protection in relation to these issues. Allocation SA25, and in particular the proposed quantum of the housing proposed, was considered at some length in written representations and at the examination hearings.

193. In particular, it was debated whether, in the light of national policy as expressed in paragraph 177 of *the Framework*, the allocation could be considered to be minor or major development within the AONB; if the allocation is considered to be major, there would need to be exceptional circumstances which would justify the amount of housing proposed in policy SA25 and whether the development would be in the public interest.

194. Footnote 60 of *the Framework* addresses the question of whether a proposal is major development. It states that whether a proposal is major development: "*is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.*"

195. District Plan policy DP16 sets the strategic parameters for development within the High Weald AONB. It makes provision for small scale proposals which support the economy and social well-being of communities within the AONB, and which are also compatible with the conservation and enhancement of natural beauty. The context for Mid Sussex is that the AONB covers most of the northern part of the District, with the exception of an area which includes East Grinstead, Crawley Down and Copthorne, and that it is clearly important to enable the organic growth of settlements within the AONB wherever this is sustainable.

196. Ardingly is one such settlement within the AONB, identified as a Category 3 settlement, i.e. a medium sized village, which provides for limited services, and where small scale growth would be acceptable in principle. The Mid Sussex District Plan IR also states that some settlements: "*lie within the AONB and may be appropriate for modest housing schemes*"⁴⁴. Clearly in a settlement like Ardingly, there is no scope for meeting local needs in close proximity to the settlement outside the AONB.
197. The Council's justification for its allocation of 70 dwellings in policy SA25 is set out in its Major Development in the High Weald AONB Topic Paper⁴⁵. This paper explains that the original total of 100 dwellings to be allocated at Ardingly in the Regulation 18 consultation version was considered to be major development due to its scale and that development of the whole site would not fit the historic settlement pattern of Ardingly, which means that there would be an adverse impact on the High Weald AONB. The Council's assessment also concluded that there would be no exceptional circumstances for this development in the AONB at Ardingly because there are alternative locations outside the AONB.
198. In the revised policy SA25 in the submitted Plan, the overall size of the site remains the same as in the Regulation 18 version. However, the proposed built development is now limited to the eastern section of the allocation, with the western part to remain as open space, along the line of an old field boundary, which the Council considers is more in keeping with the historic settlement pattern of Ardingly than in the original allocation. The Council argues that the reduced size of the allocation to 70 dwellings in the submitted version is not regarded as major development.
199. I agree with the Council that no exceptional circumstances exist to justify a major housing development at Ardingly, primarily because of its location within the AONB and its modest settlement size. I therefore have to consider whether 70 dwellings can be justified as minor development, especially bearing in mind the guidelines in footnote 60 of *the Framework* and policy DP16 of the District Plan. I also agree with the Maurici Opinions⁴⁶, which not only highlight national policy, including the above-mentioned footnote 60, but also refer to the High Court challenge in *Aston v SSCLG* [2013], where it was held that the word 'major' has a natural meaning in the English language, albeit not one that is precise⁴⁷.

⁴⁴ Mid Sussex District Plan IR para 53.

⁴⁵ MSDC Site Allocations DPD-Major Development in the High Weald AONB Topic Paper; December 2020 [Examination Document Topic Paper 1].

⁴⁶ Major Developments in National Parks by James Maurici QC, Landmark Chambers, which includes the so-called Maurici Opinions.

⁴⁷ *Aston v SSCLG* [2013] EWHC 1936 (Admin) – judgment by Wyn Williams J.

200. In terms of context, there is no doubt that the quantity of the allocation, at 70 units, exceeds what is needed locally in Ardingly. The Category 3 village has a small population, estimated at 1,910 inhabitants, and policy SA25, representing a 15% increase in the number of dwellings within the built-up boundary of the settlement, would not be proportionate to the size of the settlement, which only has a modest range of services and poor bus connections.
201. The overall housing requirement for the District, shown in the table at page 37 of the District Plan, indicates a minimum residual housing requirement (accounting for commitments and completions) for Ardingly of 29 dwellings. This figure is likely to have been reduced further through other commitments and completions in the intervening three plus years since the table was printed. I also note that the Ardingly NP indicated a need in the settlement of 37 dwellings to 2031, a figure which is also likely to have fallen in the intervening years. Based on the above information, it is my view that the quantum of development on allocation SA25 at Ardingly should not exceed 35 dwellings, i.e. half the number of homes proposed in the submitted Plan.
202. The Council and the site promoters argue that the visual impact of the proposal for 70 dwellings in the submitted policy SA25 on the AONB outside the village would be minimal, especially in the context of a robust landscape strategy. I have read and studied the Landscape and Visual Appraisal (LVA) which has been commissioned by the site owners and site promoters⁴⁸. I largely agree with the LVA descriptions of the landforms, vegetation and tree cover, and the overall conclusion that a robust landscape strategy could ensure that landscape and visual effects are minimised.
203. However, it is also true that the allocation is located on a prominent, open plot with some visibility from areas outside the village, and in particular from the Ardingly Conservation Area to the west and south-west and the open countryside views towards the Ardingly Reservoir further to the west, both of which I observed on my site visit⁴⁹. Whilst I do not agree that the allocation would result in the suburbanisation of the village, I do consider that it would impact adversely on its semi-rural setting, and on the visual containment of the area from the wider AONB landscape. In my view, these considerations render the

⁴⁸ Huskisson Brown Associates: Landscape and Visual Appraisal relating to Land West of Selsfield Road, Ardingly, West Sussex, on behalf of Charterhouse Strategic Land and The South of England Agricultural Society; May 2020 [Examination Document SA25.4].

⁴⁹ The route of the partially accompanied site visit is indicated on the map submitted in response to Action Point 9, which shows the relationship of the allocation SA25 (edged red) to both the Conservation Area and the countryside to the west.

proposal for 70 dwellings 'major' development in my understanding of its natural meaning in the English language.

204. **MM1** therefore reduces the housing total for policy SA25 from 70 to 35 dwellings, at the same overall density as in the submitted Plan (i.e. about 20 dph), located at the eastern end of the original SA25 allocation, to enable the proposal to sit within the proper context of a small settlement in the High Weald AONB, in accordance with the requirements of national policy and policy DP16 of the District Plan. Allocating a smaller scheme to the east, nearer to Selsfield Road would increase the distance from both the Conservation Area and the wider AONB landscape to the west, whilst at the same time reducing its visual impact on the village and the landscape. These changes are necessary for policy SA25 to be consistent with national policy, both in relation to the scale of the village and its limited sustainability, and also in relation to its visual impact on the AONB.
205. The Council's updated housing land supply trajectory⁵⁰ points to policy SA25 being implemented within years 6-10 and I have no reason to take a different view.

Policy SA27 - Land at St Martin Close, Handcross – 35 dwellings

206. This allocation is for 35 dwellings and is located at the western edge of the village of Handcross. Policy SA27 accords with the Slaughham NP, which allocates it as a reserve site. Although the site is located adjacent to a NP allocation for 30 dwellings within the High Weald AONB, the LVA commissioned by the site promoters⁵¹ demonstrates that the triangular shaped site can be assimilated successfully into a natural hollow which is surrounded by mature woodland, including a substantial tree screen along its western edge. It also abuts existing and proposed development along its eastern boundary. I agree with the Council's assessment that the site is not to be regarded as major development within the context of paragraph 177 of *the Framework*. **MM9** ensures that the policy appropriately includes the requirement to conserve and enhance the landscape of the AONB, in line with national policy.
207. The site is also located within reasonable access of schools, healthcare and local services in the village of Handcross, which is a Category 3 settlement. No significant access or other infrastructure issues were raised during the examination. On the basis of the above considerations, I conclude that policy SA27 is sound. The indicative

⁵⁰ Examination Document MSDC-06b.

⁵¹ Lloyd Bore: Landscape and Visual Appraisal, St Martins Close West, Handcross, West Sussex; January 2020 [Examination Document SA27.1].

phasing in the submitted policy of delivery within years 6-10 is in my view reasonable.

Policy SA28 - Land South of the Old Police House, Birchgrove Road, Horsted Keynes – 25 dwellings

208. This allocation is for 25 dwellings and forms a natural extension to the north-east of the village of Horsted Keynes. It is located within the High mature trees and hedges. **MM10** ensures that the policy appropriately includes the requirement to conserve and enhance the landscape of the AONB, in line with national policy.
209. The overall housing requirement for the District, shown in the table at page 37 of the District Plan, indicates a minimum residual housing requirement (accounting for commitments and completions) for Horsted Keynes of 53 dwellings, which approximates to the combined totals of the two allocations for this village (i.e. 25 dwellings for policy SA28 plus 30 dwellings for policy SA29). The scale of the housing allocations in the Plan for Horsted Keynes is therefore proportionate to the needs of the settlement, which is a category 3 village, with schools and other local services, although not particularly well served by bus services.
210. The LVIA which has been commissioned by the site promoters⁵² concludes that the site is appropriately located for housing development and that in landscape and visual terms the site can accommodate up to 30 units without accruing harm. I agree with the findings of the LVIA, which accord with my own site visit observations, and I conclude that policy SA28 is positively prepared and justified. I have no reason to query the Council's anticipated delivery of the scheme within years 1-5 of the plan period.

Policy SA29 - Land South of St Stephens Church, Hamsland, Horsted Keynes – 30 dwellings

211. This allocation is for 30 dwellings on the edge of the village of Horsted Keynes, and together with SA28, comprises a proportionate scale of housing provision for this settlement. Although the site is located in the High Weald AONB, the LVA commissioned by the site promoter⁵³ states that the proposed development would sit within a restricted, well contained visual envelope. From my site visit, I consider that the proposed development would sit well within the landscape and as a minor development it would not conflict with national AONB policy.

⁵² Aspect landscape Planning Ltd: Proposed Residential Development, Police House Field, Birchgrove Road, Horsted Keynes-Landscape and Visual Assessment; March 2020 [Examination Document SA28.2].

⁵³ Landscape Collective: Landscape and Visual Appraisal-Land South of St Stephen's Church, Horsted Keynes; January 2020 [Examination Document SA29.2].

MM11 ensures that the policy appropriately includes the requirement to conserve and enhance the landscape of the AONB, in line with national policy.

212. Vehicular access would be via Hamsland. The principle of development on the site has been accepted by WSCC as local highways authority both in relation to highway safety and capacity, including the adequacy of the Hamsland carriageway width to accommodate the additional traffic. Although Hamsland is characterised by parked vehicles along one side of the road, this does not lead me to a different conclusion to that made by the local highway authority.
213. There was considerable discussion at the hearing sessions regarding the effectiveness of policy SA29. The technical documents submitted by the developers, however, including a Transport Statement, Road Safety Audit and Visibility Overlay Plan⁵⁴, demonstrate that the road network can satisfactorily accommodate the traffic likely to be generated by the development, despite the existing on-street parking along Hamsland, with adequate visibility sight lines at the proposed access. Despite allegations to the contrary from third parties, these technical documents state that the proposed scheme is capable of implementation within land which is either under the control of the developers or is highway land, and I am satisfied from the level of detail submitted in these documents that the conclusions expressed above are robust.
214. Concerns were also expressed over the design and impact of the proposed vehicular access on existing trees along Hamsland, as well as the adequacy and safety of pedestrian access as a result of the proposed development. **MM20** addresses these concerns and therefore amends policy SA29 to require safe and convenient vehicular access, including for emergency services vehicles; to ensure satisfactory pedestrian access both along Hamsland and into the proposed development; and to afford adequate protection of the existing trees along the site boundary. This modification is necessary to ensure the policy is positively prepared, justified and effective. I conclude that subject to the above modifications, the policy is sound.
215. The indicative phasing in the submitted policy of delivery anticipated within years 1-5 may be optimistic in view of the considerations outlined above, however, I am satisfied that the scheme could be delivered within the plan period.

⁵⁴ See Note for Inspector from Sigma Planning Services: Site SA29 St Stephen's Church, Horsted Keynes; 15 June 2021 [Examination Document – Response to Action Point 11].

Policy SA30 - Land to the North of Lyndon, Reeds Lane, Sayers Common – 35 dwellings

216. The allocation is for 35 dwellings, located adjacent to the north-west edge of the village of Sayers Common. The proposed development would have no significant impact on the landscape and no significant access or infrastructure considerations were raised. Although access to schools and healthcare are over 20 minutes' walk away, there is a frequent bus service to Crawley with its many facilities and services. The site is located within the Brick Clay (Weald) Mineral Safeguarding Area; no evidence, however, was submitted that demonstrated that the site is required for further mineral extraction. On the basis of the above evidence, I conclude that policy SA30 is positively prepared and justified.
217. The indicative phasing of the scheme is for delivery within years 1-5 of the plan period, and I consider this to be a realistic expectation.

Issue 3 - Conclusion

218. I conclude in relation to Issue 3 that with the required modifications, the proposed housing site allocations are justified and deliverable.

Issue 4 – Are the Plan's provisions for the protection and enhancement of the environment, including landscape, biodiversity and heritage aspects, justified and in accordance with national policy?

Are the environmental, landscape, biodiversity and heritage policies justified, effective and in accordance with national policy? Are any additional environmental policies needed?

219. The Plan is the 'daughter document' of the District Plan, which has a wide range of policies that seek to protect and enhance the District's environment, including its landscape, biodiversity and heritage assets in accordance with national policy. These principles are reflected in policy SA GEN, which sets out the general principles for the site allocations, including a range of urban design principles, landscape, historic environment and cultural heritage considerations, as well as principles relating to air quality, light, noise and amenity, biodiversity and green infrastructure, sustainability and the relationship of the Plan to the Ashdown Forest. Furthermore, key environmental considerations are picked up and addressed in relevant SA policies.
220. As part of the preparation of the Plan, there has been extensive consultation with statutory consultees, such as Historic England,

Natural England, SDNPA, the High Weald AONB Unit and Sussex Wildlife Trust, who have largely been supportive of the stance taken in the Plan.

221. In response to concerns that climate change is not addressed in a single policy, the Council responded with a statement⁵⁵ in addition to contributions to the debate on this topic at the hearing sessions. Climate change is clearly referenced in the District Plan – in particular in policies DP39 on sustainable design and construction; DP40 on renewable energy schemes; DP41 on flood risk and drainage; and DP42 on water infrastructure and the water environment. In this Plan, climate change principles are covered across its policies, whilst the Council intends to include a comprehensive new climate change policy within its forthcoming District Plan Review. I am satisfied that many of the key responses to climate change are already covered in the Plan and that the Review is the most appropriate place to include a new bespoke, strategic policy on this important subject.

What is the justification for allocating the proposed number of dwellings in the High Weald AONB?

222. District Plan policy DP16 sets the strategic stance of the District towards development in the High Weald AONB. Whilst seeking to protect the valued landscape of the AONB, the policy supports small scale proposals which support the economy and social well-being of communities within the AONB and that are compatible with the conservation and enhancement of natural beauty. Also, given that approximately half the area of the District is designated as AONB, it is not surprising that a proportion (around 9%) of the residual housing total for Mid Sussex which is allocated in this Plan should be located within this part of the District, in order to support local community-based needs.
223. A list of appeal decisions has been submitted in representations, which provide details on a range of schemes, and the size of their proposals in terms of dwelling numbers, in the AONB from different parts of the country. However, as paragraph 177 of *the Framework* points out, there are no benchmark housing totals given as appropriate or otherwise within the AONB, and, critically, context is all important. Within this national policy framework, I am therefore satisfied that, in the Mid Sussex context, subject to **MM1**, which reduces the housing quantum of SA25, from 70 to 35 dwellings within a settlement that is in the AONB, that all the housing allocations in the submitted Plan comply with the requirements of District Plan policy DP16, in that they are all modest (minor) schemes which do not cause harm to the AONB.

⁵⁵ MSDC-12: Response to Action Point 15-Approach to Climate Change; 12 July 2021.

224. I also note the representations arguing that there is a significant prospect of land within the AONB being developed to meet the housing needs of the neighbouring Borough of Crawley, as has been done at Pease Pottage. This, however, is a strategic and important decision for the future Review of the Mid Sussex District Plan to make and it is therefore beyond the scope of this Plan and my report to address.

Is policy SA38, which addresses air quality, justified and effective? In particular, are the proposed mitigation measures sufficiently effective to, in all likelihood, prevent adverse effects from proposed development on the Ashdown Forest SPA and SAC?

225. I note that this policy will replace policy DP29 in the District Plan. I agree with the Council that this policy is important, given the growth proposals within the Plan and the fact that they are predicated on ensuring no further harm to the integrity of the unique ecology of the Ashdown Forest. The policy has been informed by air quality modelling, both in relation to the Stonepound Crossroads Air Quality Management Area (AQMA) and Ashdown Forest.

226. I note comments that the policy could be more complex and wide ranging, and it is of course open to the Council to consider such an approach when it prepares a future review of the District Plan. I do not, however, consider the policy to be merely platitudinous, as some parties hold, but I conclude that it is justified, effective and consistent with national policy.

Do any of the proposed site allocations threaten to harm the setting of the South Downs National Park (SDNP), and if so, can effective mitigation be achieved?

227. Paragraph 177 of *the Framework* states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. Policy DP18 of the District Plan sets out to protect the SDNP, and policy SA GEN sets out the general principles for ensuring site allocations do not impact adversely on matters of environmental importance.

228. The two allocations which have been the subject of ongoing dialogue between the Council and SDNPA are SA12 and SA13, and I deal with the principal concerns expressed by all the parties in Issue 3 above. I also note that the two principal parties referred to above have committed to continue to work together in the way they already have done to ensure the satisfactory protection and enhancement of the setting of the SDNP in future. Subject to the suggested modifications in relation to these two allocations (**MM4**), I consider that any potential harm to the setting of the SDNP resulting from these two allocations can be effectively mitigated.

Is the provision of Suitable Alternative Natural Greenspace (SANG) justified and effective in reducing the likelihood of harmful visitor pressure on Ashdown Forest?

229. District Plan policy DP17 sets out an avoidance and mitigation strategy for reducing the impact of recreational disturbance on Ashdown Forest. It is clear that the Council has prepared this policy and subsequently implemented it with the advice of Natural England (NE), who has stated it is supportive of the policy. Partnership work, in line with DTC, with neighbouring local authorities, the Conservators of Ashdown Forest, NE and other parties, is implementing a mitigation approach, based on SANGs measures, to be located within the 7 km Zone of Influence around the Ashdown Forest SPA, in addition to on-site SAMMS. These measures will help reduce the visitor pressure, especially by walkers and dogs, which increases as a result of new development within the Zone of Influence.
230. The Council, in partnership with the policy SA20 site promotor, is proposing a new strategic SANG in attractive countryside to augment the existing SANG at East Court & Ashplats Wood, East Grinstead, which I heard at the hearings was close to capacity.
231. In response to the discussion at the hearing sessions on the effectiveness of the Council's approach to SANGs, especially in taking pressure off Ashdown Forest, the Council submitted a comprehensive Note to explain its position⁵⁶ and answer some of the points made in critical representations.
232. In addition to the above points, the Council's Note explains a system of monitoring, which will allow adjustments to be made to the overall mitigation strategy if it is necessary to ensure its continued effectiveness. The Note also points to a combined yield of 940 dwellings⁵⁷ from 9 allocations within the 7 km Zone of Influence. 750 of these dwellings will be in very close proximity to the proposed strategic SANG, located immediately to the west of the proposed new dwellings in allocation SA20 and within easy walking distance to the south of SA19. At a minimum standard of 8 ha per 1,000 net increase in population, the proposed strategic SANG at site SA20, with an area of c.43 ha, would be able to serve a population several times in excess of the 940 dwellings proposed for the allocated sites in Mid Sussex, which lie within the 7km Zone of Influence around Ashdown Forest.
233. The suggestion to remove all allocations within 7 km of Ashdown Forest from the Plan would not enable the Plan to meet the needs of

⁵⁶ MSDC-13: Response to Action Point 16 – matter 4.5: Provision of SANG; 8 September 2021.

⁵⁷ This takes account of the 35 dwelling reduction to the total at Ardingly, as suggested in MM1.

the communities within this area over the plan period. Furthermore, it would necessitate finding an additional 940 dwellings in the remainder of the Plan area, which would bring its own issues in relation to sustainable development. I therefore do not consider that this suggestion would be in the interests of the soundness of the Plan.

234. It is also worth stating, as the Council's Note does, that the approach using SANG and SAMMs mitigation is well established. For example, it has been used as an approach to mitigation at the Thames Basin Heaths and Dorset Heaths for around 15 years.
235. The other key area of concern raised at the hearings was the alleged lack of monitoring, which is addressed in the above mentioned Council's Note. The Note states that "*monitoring is long-term and should be undertaken regularly rather than constantly*". The Note also acknowledges that it is important to undertake surveys at SANG sites as well as in the Ashdown Forest itself.
236. **MM22** is an addition to the sixth bullet point of the Biodiversity and Green Infrastructure section of policy SA20 to refer to the requirement of the management of the proposed strategic SANG to include regular monitoring of number of visitor numbers, locations where visitors originate from, their activities at the strategic SANG, and any suggestions for future management of the SANG. This is required to make the policy effective.
237. I therefore consider, subject to the above modification, that the provision of strategic SANG in the Plan is justified and effective in reducing the likelihood of harmful visitor pressure on Ashdown Forest.

Issue 4 - Conclusion

238. From the evidence before me, I conclude in relation to Issue 4, that the Plan's provisions for the protection and enhancement of the environment, including landscape, biodiversity and heritage aspects, subject to the above modifications, are justified, effective and are consistent with national policy.

Issue 5 – Are the policies to manage and promote the local economy and employment areas and allocations sound?

Is policy SA9, for a science and technology park (STP), in conformity with the District Plan and is the allocation sound?

239. The economic case for a science and technology park (STP) within Mid Sussex was made in the evidence submitted to the examination of the

District Plan and is set out in broad terms in District Plan policy DP1 (Sustainable Economic Development), which states that the Coast to Capital Local Enterprise Partnership (LEP) has identified Burgess Hill as a spatial priority in its Strategic Economic Plan (SEP) (2014) and identifies a broad location for a STP to the west of Burgess Hill. It has been suggested that the economic case may have changed since the District Plan was adopted. However, I am mindful that this is a part 2 or 'daughter' Plan and therefore it is not for me to re-examine the principle of, or need for, the STP.

Is the scale and location of Policy SA9 justified and in conformity with the District Plan?

240. The supporting text to policy DP1 of the District Plan notes that the STP is envisaged to deliver 100,000 square metres of employment floorspace and 2,500 new jobs. This Plan, through allocation SA9, sets out the specific location of the STP. Policy SA9 allocated 48.75ha of land in order to deliver up to 2,500 new jobs in accordance with the District Plan.
241. The Council explained at the examination hearings that the proposed STP is a different concept to the earlier employment proposal in the District Plan, and that the increased size of the policy SA9 STP allocation gives the site adequate 'critical mass' to accommodate a cluster of businesses. This appears to be a reasonable conclusion, and one that is supported by the LEP.
242. I am of the view that it is relevant to consider whether the downturn of the local economy due to Covid-19 is an argument for scaling down policy SA9 or postponing it to another time. The plan period, to 2031, however, allows ample time for economic recovery, and the local economy is relatively resilient. A recent marketing report⁵⁸ finds that the market for new employment floorspace in Mid Sussex is predicted to remain resilient, whilst the market for industrial and warehouse property for Gatwick and Crawley remains strong.
243. Another consultant's report⁵⁹ does not consider that the short-term impact of Covid on the local economy will be significant and states that the pandemic does not justify any change to policy SA9. From the evidence contained in these reports, I consider that the recent pandemic is not an argument to reduce the scale of the STP proposed in policy SA9.
244. Turning to the proposed location of policy SA9, the STP is proposed in policy DP1. The adopted District Plan Policies Map shows the STP broad location further west of DP9/The Hub, ie The Hub is to be built

⁵⁸ Rep 564-001 Terence O'Rourke Matter 5 Hearing Statement; May 2021.

⁵⁹ Rep 688-011 Vail Williams Matter 5 Statement.

out, although it does show an employment land allocation of 25 ha to the south of the A2300, which the policy refers to as a high quality business park. This employment land area 'disappears' as an allocation between the District Plan (some of which has been developed as an employment scheme called The Hub) and this Plan, whilst the STP proposed in policy SA9 in the submitted Plan before me is allocated to the north of the A2300.

245. Policy SA9 allocates land to the north of the A2300 for a STP. This is in preference to a location to the south for several important reasons, based primarily on the SA work. These include 4 key considerations:
- (i) The prospect of linking energy to waste, given the location of the WSCC waste facility immediately to the east of the allocation;
 - (ii) The proximity to the strategic housing allocation and associated community facilities, known as the Northern Arc;
 - (iii) There is a lower flood risk than in the area to the south of the A2300; and
 - (iv) There are important ecological considerations, given the Ancient Woodland to the south of the A2300.
246. I therefore find no robust reasons to come to a different conclusion to the submitted Plan regarding the location of the SA9 allocation to the north of the A2300.
247. The proposed STP is sustainably located close to Burgess Hill, which is identified in the District Plan as a town with a wide range of facilities and services, as well as being the focal point for new development to serve Mid Sussex during the plan period.
248. Furthermore, the allocation for the STP is situated adjacent to the District Plan Strategic Allocation to the north and north-west of Burgess Hill, an area known as the Northern Arc. The District Plan provides for approximately 3,500 dwellings in the Northern Arc, most of which are expected to be implemented within the plan period (as discussed in more detail under Issue 2 above). The proximity of new homes to new job opportunities should significantly reduce commuting distances for many people and encourage mode shift towards walking, cycling and bus use between the STP, the Northern Arc and the town centre.
249. The proposed STP, to the west of Burgess Hill, also enjoys good access to the A23 dual carriageway, a few miles further to the west, which connects with Brighton to the south and morphs into the M23 motorway at the northern end of the District, enabling good access to Gatwick Airport and beyond, to the national highway network and of

course London. It is hence well located to achieving the Council's objective of enhancing the prosperity of an area stretching from the coast to London, known as the Gatwick Diamond, as well as with the Greater Brighton City Region.

250. I therefore consider, based on the evidence covered in the above paragraphs, that the scale and location of Policy SA9 is justified and in conformity with the District Plan.

Is policy SA9 sound in respect of environmental impacts?

251. The impact of such a large concentration of employment land in one area will be significant, visually as well as on the tranquillity and biodiversity of the local area and would significantly push out the urban boundary of Burgess Hill westwards into open countryside; this would be a greater impact than would have been the case in relation to District Plan policy DP9, both in its size and its location, being situated further out from the edge of the town. It was argued that the STP would dramatically change what is now an agricultural area of sporadic farm buildings, although there are also a few scattered warehouses in this area. It would be incorrect to characterise this area as a pristine rural area.

252. Although it has a pleasant countryside setting, allocation SA9 is not located in any protected landscapes. Furthermore, it is located at some distance from all three of the most sensitive environmental parts of the District, i.e. it is situated away from areas directly impacting on the setting of the SDNP, and even further distanced from the High Weald AONB and the Ashdown Forest 7km Zone of Influence. This is an important consideration in a District which has such attractive environmental assets, and where land with development potential is at a premium.

253. Policy SA9 requires a LVIA to be undertaken, to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside, as well as to maximise the quality of the working environment. The policy also requires the retention of the existing woodland to the east and the retention and enhancement of the existing mature trees and landscape structure within and bordering the site.

254. In fact, a LVIA has already been undertaken⁶⁰, which states, on the basis of a layout anticipated at 4 storeys or under, that the development can be adequately mitigated. The LVIA concludes that the theoretical visibility of three storey development would be largely limited to within 2 km of the site, and the addition of 4 and 5 storey

⁶⁰ Pegasus Environmental: Landscape Technical Note; November 2019 [Examination Document SA9.6].

elements across the whole STP would only slightly extend the theoretical visibility. Moreover, the impact of the STP would not be readily perceptible from locations within the High Weald AONB or the SDNP. The impact would be further mitigated by the judicious planting of additional native forest-scale tree cover of appropriate species at locations within the site, which would of course mature over time.

255. An Ecological Appraisal⁶¹ has also been commissioned by the site promoters, which states that there is unlikely to be any significant effect on important protected habitats. It also states that further detailed ecological assessment will be required as part of any detailed planning application.
256. I am satisfied, from the evidence before me, that policy SA9 can be implemented without any unacceptable environmental impacts.

Is policy SA9 justified in terms of sustainable transport and highways impact?

257. Policy SA9 aims to encourage sustainable movement through requiring measures such as the provision of new pedestrian, cycling and new bus routes and/or diversion of existing routes to connect with key hubs, including Burgess Hill town centre and the railway and bus stations.
258. Concern was expressed over its relatively poor relationship to the nearest railway station at Burgess Hill. Although the STP is to be located on the opposite side of the town from the railway station, this matter is addressed in the Project Newton Mobility Strategy⁶², which includes specific, costed plans (based on a bus viability strategy) to divert existing bus routes and provide a new station shuttle, enabling for example, a 10 minute link between the STP and the railway station and a further 10 minute rail journey to Brighton.
259. It is evident that considerable preparation has gone into the implementability of policy SA9. The policy sets out the requirement for a master plan and a phasing strategy, which is linked to transport and environmental mitigation.
260. A signed SCG⁶³ commits the main parties involved in transport provision for what is termed 'Project Newton', to prioritise reduction in

⁶¹ Ecology Solutions: Ecological Appraisal [Examination Document SA9.13].

⁶² Connect Consultants - Project Newton Science and Technology Park, Burgess Hill: Mobility Strategy; November 2020 [Examination Document SA9.11].

⁶³ Project Newton Science and Technology Park SCG between Connect Consultants, Vail Williams, MSDC, WSCC and Highways England; 21 May 2021 [Examination Document SA9.17].

traffic associated with the STP through a mobility strategy. A key part of this is to achieve substantial modal shift, including 50% from car to bus between the STP and Burgess Hill town centre, and a 29% reduction in all peak hour trips by car. The SCG also commits the parties to achieve effective highway mitigation, involving capacity improvement, at five specific locations (A23-A2300 Hickstead Junction east and west; A23-A2300 Hickstead Junction southbound merge; A2300-Cuckfield Road roundabout; A2300-Northern Arc Link Road roundabout; and A272-B2036 mini-roundabout, Ansty).

261. Consequently, I am content that policy SA9 is justified in relation to sustainable transport and highways impact.

Policy SA9 - Conclusion

262. I am satisfied, for all of the above reasons, that policy SA9 is in conformity with the District Plan and the allocation is sound.

Are policies SA2-SA8, for additional employment allocations, justified and deliverable, and are they sufficient to meet the needs of the District during the plan period?

263. Sites SA2-SA8 comprise seven employment allocations, which were selected through a robust site selection process and assessment through the SA. There has also been ongoing engagement between the Council and the relevant site promoters. I am satisfied from the evidence and site visits that all the employment sites are well located in relation to the main urban areas in the District and the strategic highway network.

264. **MM5 and MM6** amend the second bullet points of policies SA7, for the site at Cedars, Brighton Road, Pease Pottage, and SA8, for the site at Pease Pottage Nurseries, Brighton Road, Pease Pottage. This is to underline the importance of the need to conserve and enhance the landscape and scenic beauty of the AONB, within which both SA7 and SA8 are located. This accords with national policy, for example as expressed in paragraph 177 of *the Framework*, which states that great weight should be given to conserving and enhancing landscape and scenic beauty in designations such as AONBs, which have the highest status of protection in relation to these issues.

Is policy SA34, which sets a framework for the protection, intensification and redevelopment of existing employment sites, justified, effective and consistent with national policy?

265. A policy framework to provide for consistent decision making in relation to proposals for changes to existing employment sites is set out in policy SA34. In particular, it is necessary to prevent the inappropriate loss of employment land to other uses. It is

acknowledged that the market alone is unable to secure the retention of employment land in the face of competition from higher value uses such as residential. It is therefore important to provide a safeguard which both protects existing employment land and allocations whilst allowing for flexibility, which reflects national policy, as expressed in paragraph 81 of *the Framework*, which states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.

266. **MM12** ensures that policy SA34 is effective as well as being justified. It does this by requiring details of comprehensive marketing of a site for employment use, which is subject to development proposals outside the traditional employment use classes for a period of at least 12 months. It also requires a financial appraisal that demonstrates that the development of any employment generating use is unviable. I consider that 12 months is a reasonable period for the effectiveness of the Plan in playing its part to secure sustainable economic growth for Mid Sussex which would be consistent with national policy.
267. **MM12** also allows for development proposals outside the traditional employment land use classes where it can be demonstrated that the continued use of the site for employment uses would lead to environmental problems, such as noise pollution or disturbance, recognising that there would be environmental benefits gained by redeveloping these sites for non-employment generating uses.

Is the Plan likely to maintain, enhance or detract from a sustainable housing/employment balance in the District, or is it more appropriate to consider Mid Sussex in relation to its near neighbours, such as Brighton and Crawley? Is there a balance between housing provision and maintaining an adequate supply of employment land?

268. I note the Council's explanation that the employment policies reflect the annual average number of jobs needed for the District, which is estimated at 543. This figure is closely linked to the increase in population and provides the appropriate homes/jobs balance. This equates to a 10-15 ha employment land requirement, and the Plan allocates seven employment sites (policies SA2-SA8), totalling 17.45 ha, which amounts to a small over-supply for flexibility and resilience.
269. In addition, the proposed STP has been allocated to deliver the Council's objectives for high value economic growth, on a site adjacent to the Northern Arc strategic allocation (3,500 dwellings), as well as providing job opportunities within the wider region, including nearby neighbours Brighton and Crawley. A further sustainable aim of the STP is to reduce out-commuting.

270. It is clear to me that a key aim in the Plan, to achieve a sustainable housing/employment balance, is likely to be achieved, both at the District level, but also, through the STP, within a wider, regional context, with the added advantage of making an inroad into the strong pattern of out-commuting, both to London but also to Brighton and other neighbouring towns.
271. Concerns were expressed over the lack of employment allocation in the Plan in the area between East Grinstead, Felbridge and Crawley Down, despite a significant amount of additional housing directed into this area by the Plan, especially the sites at SA19 (Land South of Crawley Down Road, Felbridge) and SA20 (Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead). However, this area is within easy commuting distance of employment opportunities in neighbouring Crawley, including Gatwick Airport, as well as being located relatively close to the proposed STP, and I therefore do not accept that the lack of employment allocations in and around East Grinstead is unsustainable.

Conclusion – Issue 5

272. From the evidence before me, I conclude that in relation to Issue 5, subject to the above modifications, the Plan's policies to manage and promote the local economy and employment areas and allocations are sound.

Issue 6 – Are the infrastructure and transport provisions of the Plan sound?

Are there any necessary infrastructure needs that are not addressed in the Plan?

273. The Plan is accompanied by an Infrastructure Delivery Plan (IDP)⁶⁴. The IDP has been prepared based on ongoing work with infrastructure providers to identify any necessary infrastructure requirements. SCGs have been signed with Scotia Gas Network, South East Water, Southern Water, Thames Water, UK Power Networks and West Sussex Clinical Commissioning Group. None of these bodies has indicated any concerns that the Plan has not addressed any necessary infrastructure needs, and some have written in support of the Plan. Overall, I am satisfied from the evidence before me that the Plan has addressed the necessary infrastructure needs in a satisfactory way.
274. Some concerns are expressed over the adequacy of the highways network to accommodate the growth provided for in the Plan,

⁶⁴ Site Allocations DPD: Infrastructure Delivery Plan (IDP); December 2020.

especially around East Grinstead and Burgess Hill. However, this is not the view of National Highways or the WSCC, the local highways authority, and I deal with highways issues in more detail below.

Are there any water supply, flood risk, or sewerage issues that could be described as significant constraints, and if so, can they realistically be overcome within the plan period?

275. Most of the area is identified as having a deficit in water supply, in common with much of the South East of England and East Anglia. The Council has indicated that it intends to work on policies to increase water efficiency, in line with comments from Thames Water and the Environment Agency (EA), at the District Plan review stage. There is no objection to this course of action from the relevant statutory undertakers, and I see no reason to take a different view. Clearly, this is an issue which all local planning authorities within the region will need to grapple with in the not-too-distant future in the light of climate change and increased demands from population and economic growth on the finite level of water supply.
276. The SA identifies approximately 2.7% of the total land area of the District is at a high risk of flooding, and approximately a further 0.48% which is affected by drainage problems, groundwater flooding and overland flows. Most of the allocations for development in the Plan are recorded by the SA as having zero or neutral impact in relation to flooding, with the exceptions of policy SA9 (Science and Technology Park), policy SA19 (Land South of Crawley Down Road, Felbridge) and policy SA24 (Land to the North of Shepherds Walk, Hassocks). However, all three of these policies are supported by the EA, in its Regulation 19 representation, with regard to the policy wording setting out the required flood risk and drainage mitigation. The EA also singles out policy SA2 (Burnside Centre, Victoria Road, Burgess Hill) and policy SA20 (Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead) as being acceptable in terms of flood risk and drainage mitigation.
277. I also note that although the Goddards Green Wastewater Treatment Works is identified as having constraints in relation to capacity and odour, the appropriate mitigation work is nearing completion and will be able to satisfactorily accommodate the Northern Arc proposed developments. In view of the above considerations, I am satisfied that any water supply, flood risk or sewerage issues can realistically be overcome within the plan period.

Are there any issues arising from the development allocations on the strategic highways network or on any locations with potential highways/pedestrian safety issues, and if so, can they be satisfactorily overcome?

278. The impact of the proposed development allocations on the strategic highways network, especially in the Burgess Hill area and along the A22/A264 corridor to the west of East Grinstead, was debated in detail and with passion at several hearing sessions. There is clearly a feeling among many residents and some of their representatives that, in traffic terms, "enough is enough" and that the District is reaching a tipping point in some traffic 'hot spots', where quality of life is, or is about to be, they consider, affected for the worse.
279. Two principal traffic related concerns are set out in the representations. The first relates to whether the traffic modelling, which the Plan uses in assessing traffic impact on the highways network, is fit for purpose. A second major concern is whether the impact of the proposed development allocations in the Plan would be acceptable in terms of national policy – i.e. whether any such development would cause an unacceptable impact on highway safety, or whether the residual cumulative impacts on the road network would be assessed as 'severe'; bearing in mind that paragraph 111 of *the Framework* states that development causing 'severe' impact should be prevented or refused on highways grounds. Even though this paragraph appears in my judgment to be primarily aimed at development management, i.e. responding to planning applications rather than specifically at local plan examinations, I still regard it as a relevant consideration in assessing the soundness of local plan policies.
280. It was explained by the Council and several other parties that the traffic modelling study commissioned by the Council – known as the Systra model – was used to build up the Mid Sussex Transportation Study (MSTS), which formed the basis for assessing the impact of the development proposals in the Plan (and also upon significant routes in the Ashdown Forest). Evidence submitted to the examination⁶⁵ showed that the model was produced in accordance with standard good practice as set out in the Department for Transport (DfT) WebTag guidelines. It has also been validated by National Highways and WSCC as being robust and fit for purpose.
281. Several parties also stated that the District-wide Saturn modelling undertaken by Systra, which considers the impact of development allocations on the District as a whole, is an entirely standard and appropriate way of evaluating transport impacts at the local plan stage, a view I support. As these parties point out, the need for

⁶⁵ Including the Local Model Validation Report (LMVR) [Examination Document T1].

additional local detail can be addressed at the planning application stage through the Transport Assessment (TA) process, which I also consider to be the appropriate stage in the planning process to assess specific schemes in greater detail.

282. Whilst the term 'severe' is a subjective term, the Systra based MSTs sets out a definition which helps to clarify the difference between 'severe' and 'significant' transport impacts⁶⁶, which is an important distinction in relation to national policy (as explained above). In order to determine the cumulative impacts on the highways network, the Study defines a starting point of 2017, with the end date coinciding with the end of the plan period (2031). It was also carried out in parallel with work on environmental impact and air quality. Several development scenarios were tested, encompassing the 22 housing and the 8 employment sites allocated in the Plan, including the STP⁶⁷.
283. A major area of disagreement between the Council, supported by the local highway authority (WSCC) on one side and several residents and some of their elected representatives and action groups, including Infrastructure First on the other side, is whether the MSTs (and the Plan) has taken into account cumulative traffic impact, as opposed to just the impact of the individual schemes included in the Plan. In addition to the Council's written response to the MIQs, an additional paper was written on cumulative impact⁶⁸. This paper, which has been directly informed by WSCC as the local highway authority, models the Reference Case (the situation at the end of the plan period), from which additional impacts associated with the allocations in the Plan can be identified and supporting infrastructure assessed.
284. The Study identifies 9 highway junctions in the District which it explains would experience 'severe' impacts without mitigation, 5 of which are located in and around Burgess Hill, with two more to the south of Burgess Hill (Hassocks and Pyecombe), and one just to the north of the town, at Ansty, leaving just one additional 'severe' junction at Crawley Down. The Study also identifies a further 8 significantly impacted junctions, again mainly focused on Burgess Hill.
285. No other parties set out a definition of 'severe' transport impact in such comprehensive detail as in the MSTs. The examination presented the opportunity for further scrutiny of this definition, and whilst concern was expressed over congestion levels and what is meant by cumulative congestion, the formula itself in the MSTs was not challenged per se. Having listened carefully to the debate at the

⁶⁶ Mid Sussex Transportation Study: Modelling Report; 3 March 2020, page 31, para 3.4.3 [Examination Document T7].

⁶⁷ Set out in greater detail in the Mid Sussex Transportation Study: Modelling Report; 3 March 2020 [Examination Document T7].

⁶⁸ MSDC21: Response to Infrastructure First – Interpretation of Cumulative Impacts in respect of MM2; 10 February 2022.

hearings and read the evidence, I have no reasons to come to a different definition.

286. The Study sets out a wide ranging series of proposed sustainable mitigation schemes, all of which aim to reduce car trips within a range of 1-3%, following the implementation of the housing and employment allocations, including the STP. The Study also proposes highway mitigations to directly address the 'severe' impacts that cannot be fully removed by sustainable measures alone. The scenario of sites experiencing 'severe' impacts after mitigation is reduced from 9 to one following implementation of the Plan.
287. The one remaining site which is deemed 'severe' following the implementation of the allocations in the Plan is the B2028 Tanners Way/Wallage Lane junction, Crawley Down, where the 'severe' impact is considered to be relatively marginal due to the PM peak volume over capacity increasing from 83% to 98%. The Study explains that it is not considered appropriate to undertake junction improvements which could result in facilitating additional through traffic on Wallage Lane, rather than using more appropriate east-west routes including the A264. This appears to be the most sustainable approach, and I do not consider that the application of the Study in relation to the Tanners Way/Wallage Lane junction undermines the soundness of the Plan.
288. I am satisfied, from studying the written evidence and from the discussion at the examination hearings, that the MSTS and the Systra modelling it is based on, is fit for purpose and is based at the appropriate level for assessing the traffic impact of the site allocations in the Plan.
289. Most of the traffic related concerns expressed in representations relate to two areas – in and around Burgess Hill; and along the A22/A264 corridor to the west of East Grinstead.
290. In the Burgess Hill area, the principal concerns relate to the impact of allocation SA9 for the STP to the west of the town, and allocations SA12 (Land South of 96 Folders Lane, Burgess Hill) for 40 dwellings and SA13 (Land East of Keymer Road and South of Folders Lane, Burgess Hill) for 300 dwellings, both situated close to each other on the south-eastern fringe of the town.
291. The MSTS identifies three of the 9 severely impacted junctions in the District to the west of Burgess Hill; these are:
- (i) the A23/A2300 junction, southbound on-slip;
 - (ii) the A23/A2300 junction, eastern roundabout; and

(iii) the A2300/ Northern Arc Spine Road junction.

292. The principal cause of the severe traffic impact on these three junctions is, unsurprisingly, the STP. The Council and the promoters of the STP, as set out in a signed SCG⁶⁹, have agreed a phased package of physical measures designed to mitigate the residual traffic impact by improving the capacity at the above-mentioned key junctions. The MSTS demonstrates that the result of these measures is to reduce the level of impact from 'severe' to 'significant' at junctions (i) and (iii) and to 'OK' at junction (ii).
293. These design solutions are not the subject of any objections and I see no reason not to accept the contention by the promoters and the Council that they can satisfactorily mitigate any impact on the Strategic Highway Network. The above-mentioned SCG also includes capacity improvement schemes at the A272/mini-roundabout, Ansty (deemed to be severely impacted in the MSTS prior to mitigation) and at the A2300 Cuckfield Road roundabout.
294. The Council, together with the local highways authority and the scheme promoters, have also worked on an ambitious plan to achieve significant modal shift towards increased sustainable transport, and I deal with this in more detail in Issue 5 above.
295. Concerns were expressed over the traffic impact that allocations SA12 and SA13 would have on the highway network in south-eastern Burgess Hill. Burgess Hill Town Council, whilst accepting the validity of the Systra model, nevertheless considered the interpretation of the outputs from the MSTS to be flawed, both in relation to pedestrian safety, as well as vehicular congestion and levels of severity. I note that firstly, a stage 1 Road Safety Audit regarding the proposed access to site SA13, for 300 dwellings, did not highlight any material concerns. Furthermore, the proposed pedestrian, cycle and emergency access points offer good connectivity to off-site infrastructure, and the development proposals would enable off-site enhancements to the pedestrian environment and bus stop provision between the site and the town centre.
296. The MSTS shows that the Junction Road/B2113 junction, just to the north of sites SA12 and SA13, would be severely impacted by the proposed development without mitigation. However, with the proposed improvements, this junction moves down to 'significant', although two other junctions in Burgess Hill, including the Folders Lane/Keymer Road junction, which is located in very close proximity

⁶⁹ Statement of Common Ground (SCG) between Connect Consultants, Vail Williams, Mid Sussex District Council, West Sussex County Council and Highways England in relation to Project Newton Science and Technology Park; 21 May 2021 Update [Examination Document SA9.17].

to allocation SA13, have changed from 'no impact' in the without mitigation scenario to 'significant'. The reason for this, as explained in the MSTs, is that the mitigation strategy draws traffic back to the A23/A2300 and the main arterial routes through Burgess Hill, away from residential streets, which is the desired overall outcome, benefitting the town as a whole.

297. I also note that WSCC, in agreeing with the MSTs findings, states that whilst the queue length and waiting times for traffic will increase in the vicinity of sites SA12 and SA13, the level of such increases is not considered to be 'severe' and is appropriate in highway terms. Whilst I agree that the traffic impact would appear to be greater than the level of congestion experienced in the south-east of the town now, I agree with the findings of the MSTs that none of the junctions closest to sites SA12 and SA13 – and indeed none of the junctions throughout Burgess Hill – would reach the level of 'severe' as defined in the Study.
298. These findings of the MSTs have to be considered in the light of two additional factors; firstly, the improvements are likely to impact positively on modal shift, resulting in increasing numbers using buses, cycling and walking as a direct result of the measures proposed, and paid for, in part by Section 106 agreements with the committed developers, as set out in the above-mentioned SCG.
299. Secondly, a point was made in representations and verbally at the hearings, that, whilst traffic impact is a key consideration, it has to be balanced against or alongside other aspects of sustainability, which I have already considered earlier in my report in relation to policies SA12 and SA13. Related to this, it was also stated that there will typically be a greater traffic impact in a more sustainable location, such as Burgess Hill, given that there will generally be greater traffic movements as a result of proximity to a larger number of facilities and services in more sustainable locations than elsewhere⁷⁰.
300. Taking account of all the considerations set out in the above paragraphs, I firstly agree with the Burgess Hill Town Council and others that traffic levels are already an issue for the town. Secondly, I consider that Burgess Hill and its environs will experience an overall improvement in traffic impact (i.e. slightly lower levels of traffic in total and the elimination of the four existing 'severe' impacts on junctions in and around the town), following the implementation of the Plan.
301. However, these improvements will only be achieved if the sustainable transport measures and highway improvements which are set out in the MSTs, are delivered as proposed, both in relation to the STP

⁷⁰ Evidence given on day 3 of the hearings, 3 June 2021.

(policy SA9) and the proposed housing allocations in the south-east periphery of the town (policies SA12 and SA13). These measures and improvements are covered within policies SA9, SA12 and SA13, and therefore constitute an important consideration in favour of the soundness of these policies.

302. Turning to the A22/A264 corridor to the west of East Grinstead, although the MSTs acknowledges that the signalised Felbridge A22/A264 junction is a 'hotspot' where delays are regularly experienced, the junction is not identified as having 'severe' impacts, either currently or within the scenario of implementing the housing allocations of SA19 (Land South of Crawley Down Road, Felbridge) for 200 dwellings, and SA20 (Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead) for 550 dwellings. However, the Study states that a 'severe' impact is only avoided by rerouting onto less suitable routes, and to avoid this and significantly reduce congestion at the junction, significant mitigation of the A22/A264 junction would be required.
303. The MSTs is broadly supported by the TAs for policy SA19⁷¹, which forecast that the Felbridge junction would operate at capacity, with minimal impacts arising from the proposed development, which is consistent with the MSTs Systra assessment.
304. The Transport Appraisal for SA20⁷² summarises the findings of the transport studies undertaken to support the allocation of 550 dwellings at Imberhorne Farm. It notes that a TA will be produced at the planning application stage but also notes that the existing transportation work shows that the Felbridge junction is forecast to operate at overcapacity in the MSTs 2031 scenario and that as a result of the queuing at the junction, there is some level of traffic re-routing to avoid using this junction, and that the alternative routes within the network (B2010 and B2028) are viable, and as such the impact of the development proposed in the Plan is not considered to be 'severe'.
305. Overall, I consider that the MSTs is supported by other traffic studies, including those mentioned above and a microsimulation assessment by the SA20 consultants. These studies show that the strategic improvement schemes proposed, and which are covered in policy SA35 (Safeguarding of Land for and Delivery of Strategic Highway Improvements), together with sustainable transport interventions which are outlined in policies SA19 and SA20, would not only mitigate

⁷¹ Transport Assessment: Site 196, Land South of Crawley Down Road, Felbridge, for Barratt David Wilson Homes; Motion Consultants; July 2020 [Examination Document SA19.6].

⁷² Imberhorne Farm, East Grinstead Transport Appraisal, by Pell Frischmann for Welbeck Strategic Land; 17 July 2020 [Examination Document SA20.4].

the impact of these allocations, but would provide a strategic betterment in terms of journey times and overall operation of the highway network, including Felbridge junction.

306. Reference was made to another study, known as the draft WSP Study, which included investigation and design work to ascertain potential options to address capacity issues at the A22/A264 Felbridge Junction and the A22 corridor through East Grinstead. The SCG⁷³ signed by MSDC and Tandridge DC, stated that there was agreement that the study is emerging evidence and not yet completed and therefore is not publicly available.
307. I also note that all the parties who have commissioned the study (MSDC, Tandridge DC, WSCC and Surrey CC) have agreed that further work is necessary to understand traffic flow through all the junctions on the A22 corridor, including Felbridge Junction, and that no conclusions can be drawn from the draft WSP report at this stage. The report is still draft, it was commissioned for another plan (Tandridge Local Plan) and it will be superseded. I can therefore understand why it has not been used as part of the evidence base for this Plan, and it forms no part of the evidence base of my report.
308. In concluding on the impact of the Plan on the highways network, I acknowledge that in several areas within the District, many of the roads are busy and experience congestion, even significant congestion, at several key junctions. However, the MSTs, which has been assessed as fit for purpose by both National Highways and WSCC, has demonstrated that with one exception, none of the impacts arising from the Plan are likely to be 'severe', and therefore contrary to national policy, and that policies are in place to require appropriate enhancements to sustainable transport provision.
309. Highways matters were debated fully in several sessions during the hearing sittings. On the basis of all that I have read and heard, I consider that there is a reasonable likelihood that all the allocations can be delivered in line with the expectations in the Plan. If, however, any of the allocations stall and are considered to be uneconomic for highway reasons, it will be incumbent on the Council to review its housing land supply and assess the deliverability of alternative sites. I also consider it will be at the planning application stage for more detailed TAs to be submitted to address specific problems of congestion and/or safety.

⁷³ SCG regarding the Mid Sussex DC Site Allocations DPD, signed by MSDC and Tandridge DC; 8 July 2020 [Examination Document DC13].

Is policy SA35, which addresses the safeguarding of land for and delivery of strategic highway improvements, justified, detailed and effective to enable the delivery of the following schemes: (i) A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions; (ii) A264 Corridor upgrades at Copthorne Hotel Junction; and (iii) A23 junction upgrades at Hickstead?

310. The policy safeguards land for the delivery of the three above-mentioned key highways schemes in the District. In relation to schemes (i) and (ii), these junctions have been identified as having pre-existing capacity/safety issues; policy SA35 intends to safeguard the relevant land to enable delivery in due course, with a commitment to more detailed design and feasibility work to be carried out in consultation with WSCC and other relevant parties and will be subject to further consultation. In relation to scheme (iii), the A23 junction upgrades at Hickstead, safeguarding is required to support the mitigation associated with policy SA9 for the STP.
311. Policy SA35 also acknowledges that the planning and funding of highway and transport infrastructure can take time to prepare. The policy also ensures that the implementation of the Plan is not compromised by inappropriate development occurring in the interim which could prevent future highway schemes being delivered at some point during the plan period. Work to refine highway infrastructure proposals will only be considered once all the relevant sustainable travel interventions have been fully explored and taken into account. I note that in relation to policy SA9, three options for the proposed mitigation of the A23 are currently being explored, and that the overall mitigation package can be provided wholly within the highway boundary, with no obvious barriers to delivery.
312. In relation to policies SA12 and SA13, the Folders Lane area in Burgess Hill is identified as suffering from congestion. The strategic TA undertaken by the site promoters, which has been validated by WSCC, does not identify any 'severe' traffic impacts associated with the proposed allocations. I agree with the Council that, based on the evidence submitted to the examination, and which is summarised earlier in my report, there is no evidence to suggest any 'severe' impacts arise from policies SA12 and SA13 and no highway capacity mitigation has been identified as required and therefore no land required for safeguarding.
313. **MM13** ensures that the policy which safeguards strategic highway improvement land also meets the requirements for biodiversity net gain, in accordance with national policy, as expressed in paragraph 174 (d) of *the Framework*.
314. On the basis of the above considerations, I am satisfied that policy SA35 is justified, detailed and effective to enable the three above-

mentioned schemes (i) to (iii) to be delivered within the plan period, and that there is no need to amend the policy to include additional reference to any specific works associated with either policy SA12 or SA13.

Is policy SA37 for the Burgess Hill/Haywards Heath Multifunctional Network justified and effective, both in principle and in relation to the preference of routes proposed for pedestrian and cycle routes? Although the policy is indicative, in view of the concerns expressed in some representations and the need for a measure of certainty, should the policy be linked to a realistic time frame for selection of preferred route(s) and final implementation of a preferred route(s)? What are the biodiversity aspects of pursuing the various options?

315. It is clear from the evidence that the policy would potentially deliver multiple benefits, including enhancing road safety, providing sustainable commuting alternatives between the two largest settlements within the District, reducing the use of the private car, tackling traffic congestion and supporting healthy lifestyles. However, no route is yet confirmed or fully designed. It is accepted that the scheme is at an early point in its gestation, and I consider that policy SA37 is necessary to safeguard the options from development that may prejudice the implementation of a finally agreed scheme. There is clear support for the project from both Burgess Hill and Haywards Heath Town Councils, although I note concerns about the choices of routes from some third parties.
316. In terms of scheme progress and choices of routes, I note that each potential route has undergone a feasibility study, with the proposed Western Route preferred, which would link Wivelsfield Station, Leylands Road, Maple Drive and the Northern Arc strategic housing development to Isaac's Lane via Freeks Lane, partly along an existing, upgraded public footpath.
317. A secondary, Eastern Route, linking Wivelsfield Station, the Northern Arc development and Fox Hill, was withdrawn following public consultation. From discussion at the hearing sessions, although there is clearly not agreement on choices of routes and I note that a Central Route appears to have not been progressed, I am satisfied that the Council has sought to engage with the public openly over what appear to be difficult route choices and have listened to comments from Sussex Wildlife Trust, which have led to the modification to the policy, which I address below.
318. **MM14** modifies policy SA37, to ensure that the detailed design work of the Multifunctional Network has a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features. This ensures the policy is in accordance with

national policy on habitats and biodiversity, as expressed in paragraph 174 (d) of *the Framework*.

Does the Plan adequately address the need to protect playing fields and/or other community facilities?

319. District Plan policy DP24 protects against the loss of playing fields in Mid Sussex, whilst policy DP25 protects against the loss of community facilities. Policy SA16, for the redevelopment of St Wilfrid's Primary School for a mixed use scheme including housing and community facilities, involves the loss of the existing playing fields, but the policy refers to the establishment of a strong sense of place, focused around a high quality area of open space. The policy also requires either reprovision of the school playing fields or the justification of their loss to the Council and Sport England.
320. Policy SA20 (Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead) requires a land swap agreement between WSCC and the developer/promoter, to secure 6 ha (gross) land for new playing fields in association with Imberhorne Secondary School, which it is considered will yield positive improvements and protect against any loss.
321. Policy SA25 (Land West of Selsfield Road, Ardingly) is subject to a main modification **MM1**, which reduces the number of new homes from 70 in the submitted version to 35 dwellings, with the inclusion of strategic landscaping at its western end. Although the site is used for informal recreation, it is not a designated playing field; moreover, it is located adjacent to the village recreation ground, whilst the policy states that requirements for suitably managed open space and equipped children's play space will be addressed, for implementation either on-site or by financial contribution to upgrade existing adjacent facilities.
322. On the basis of the above examples, I consider that the Plan adequately addresses the need to protect playing fields and/or other community facilities, in accordance with national policy.

Issue 6 - Conclusion

323. From the evidence before me, I conclude that in relation to Issue 6, subject to the above modification, the infrastructure and transport provisions of the Plan are sound.

Issue 7 – Development management, uncertainties and risks

Development management: Does the Plan provide sufficient guidance to cover all the relevant aspects of development management which are required to achieve the satisfactory implementation of the Plan?

324. Concerns were expressed that the submitted Plan did not provide elderly persons' housing guidance for development management, but this subject has been addressed in Issue 2 above. The point was made in one representation that the Plan should avoid unnecessary duplication of policies, and no evidence was put to the examination that additional development management policies are needed to supplement those in the District Plan.

Uncertainties and Risks: Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?

325. The District Plan and this Plan collectively make provision for a mix of housing sizes and types and has an oversupply of 907 dwellings (about 5.95% of the District's minimum housing requirement, i.e. significantly greater than the 2.9% buffer in the submitted Plan) and an additional 2.54 ha of employment land (in addition to the STP which is intended to meet economic need at a sub-regional level). I agree with the Council that this amount of over-supply provides an acceptable level of flexibility to ensure that the District's housing and employment land requirements are met in full with an element of choice, and this can enable the Council to address unexpected issues relating to deliverability within the plan period.

326. I note from the evidence and discussion at the hearing sessions that the Council has worked closely with site promoters and developers to ensure that barriers to timely delivery of sites have been satisfactorily addressed. I also note from the hearing sessions that there is recent evidence showing that the Mid Sussex housing market is very robust. There is therefore little likelihood that the Plan will under-deliver on its housing targets within the plan period.

Are the Plan's monitoring arrangements soundly based? Should biodiversity net gain be monitored?

327. For each policy, the monitoring schedule identifies the indicators, target(s), implementation and monitoring source. It is also worthy of comment that the only representations in relation to monitoring at either Regulation 18 or 19 stage related to biodiversity net gain. NE and Sussex Wildlife Trust argue that biodiversity net gain should be monitored. I agree with the desirability of this in principle, and it is now included as a requirement in the Environment Act 2021, which

was still a Bill at the time of the hearings. **MM15** sets out the new indicators which will seek to measure biodiversity net gain or loss in relation to each allocation in the Plan and policy SA GEN. This brings the Plan in line with national policy, as expressed in paragraph 174 (d) of *the Framework*.

Conclusion – Issue 7

328. From the evidence before me, I conclude that in relation to Issue 7, subject to the above modification, there are no soundness issues in relation to development management, uncertainties or risks, and the Plan is therefore sound in relation to these aspects. I am also satisfied that there are no additional soundness issues which my report needs to cover in relation to the Plan.

Assessment of Legal Compliance

329. My assessment of the legal compliance of the Plan is summarised below:

- (i) The Plan has been prepared in accordance with the Council's Local Development Scheme.
- (ii) Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
- (iii) The Sustainability Appraisal (SA) has been carried out at all stages of the preparation of the Plan and is adequate.
- (iv) The Plan complies with the Habitats Regulations. The Habitats Regulations Assessment (HRA) concludes that the Plan is justified and effective in relation to the Habitats Regulations.
- (v) Although the Plan does not contain a specific policy addressing climate change, it is clearly referenced in the District Plan under several policies and climate change principles are covered across the Plan's policies. The Council has indicated its intention to include a strategic climate change policy within its forthcoming District Plan Review. I am satisfied that this is the appropriate way forward for Mid Sussex.
- (vi) The Plan is in general conformity with the Mid Sussex District Plan.
- (vii) The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

330. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

331. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix, the Mid Sussex Site Allocations Development Plan Document satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound and capable of adoption.

Mike Fox

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix - Mid Sussex SA DPD Examination – Main Modifications

The modifications below are expressed either in the form of ~~strikethrough~~ for deletions and **emboldened** for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ins Ref	DPD Section	Proposed Change	Reason for modification
MM1	Policy SA25, page 73	<p><i>Modify policy SA25: Land West of Selsfield Road, Ardingly, for 70 dwellings, as follows:</i></p> <p>Number of Units: 70 35 dwellings.</p> <p><i>Under Urban Design Principles: New first bullet point:</i></p> <ul style="list-style-type: none"> Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end. <p><i>Amend Policies Map to reflect this modification.</i></p>	<p>The modification is necessary because no exceptional circumstances have been demonstrated to justify the allocation of a major housing development at Ardingly, which is a small, Category 3 settlement within (washed over by) the High Weald Area of Outstanding Natural Beauty (AONB).</p> <p>The total of 70 dwellings in the submitted Plan is considered to be major development at Ardingly for two main reasons – first, its scale in relation to the size and housing needs of Ardingly, and second, its impact on the character and appearance the AONB. These reasons are relevant in light of national policy as expressed in paragraph 177 and Footnote 60 of <i>the Framework (2019)</i>, and District Plan policy DP16.</p> <p>Its impact on the character and appearance of the Ardingly Conservation Area is also a material consideration.</p> <p>Reducing the size of the allocation to 35 dwellings at the same density as the proposal in the submitted Plan (ie about 20 dph) reduces the required area for development of SA25 to approximately half the area in the submitted allocation, but with an allowance for strategic landscaping.</p>

			Locating the reduced allocation of 35 dwellings to the eastern end of the submitted Plan allocation would reduce the impact on the setting of the Conservation Area on and around Street Lane and on the broader, rural AONB, especially to the west and southwest of Ardingly.
MM2	Policy SA20, page 59	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Social and Community:</i> Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.</p> <p><i>The area for the older persons' dwellings needs to be defined on the Policies Map.</i></p>	The modification is necessary in response to the fact that the submitted policy SA20 fails to indicate any quantitative provision for specialist housing for older people. The inclusion of a specific quantitative requirement for such development is justified and in accordance with national policy as expressed in paragraph 62 of <i>the Framework</i> .
MM3	New policy to address the need for specialist accommodation for older people and care homes	<p><i>Include new criteria based policy to provide for specialist accommodation for Older People and Care Homes within Mid Sussex, as follows:</i></p> <p>There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Housing and Economic Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) in 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.</p> <p>Proposals for specialist accommodation for older people and care homes will be supported where:</p> <p>a) It is allocated for such use within the District Plan,</p>	<p>The modification takes account of the recent appeal decision in relation to a proposal for an extra care development of up to 84 units of Use Class C2 at Albourne. This appeal decision underlines the importance of providing for older persons' housing, both in paragraph 62 of <i>the Framework</i>, and also in the Planning Practice Guidance, which stresses that the need to provide housing for older people is critical in view of the rising numbers in the overall population.</p> <p>Moreover, the need for specialist housing for older people is set to increase significantly in Mid Sussex during the rest of the plan period, with no signs of slowing down.</p> <p>The statistical context at the start of the policy gives some steer as to how much need there actually is for specialist accommodation for older people and care homes.</p>

		<p>Site Allocations DPD or Neighbourhood Plan; or</p> <p>b) It forms part of a strategic allocation; or</p> <p>c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or</p> <p>d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (policy DP4).</p> <p>In all circumstances, the site must be accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. Proposals must demonstrate how reliance on the private car will be reduced and be 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, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.</p>	<p>The locational and accessibility criteria, which effectively limit new specialist accommodation for older people and care homes within Mid Sussex, is necessary to accord with national policy, as expressed in section 8 of <i>the Framework</i>, which promotes healthy and safe communities as well as with the national sustainability ethos which permeates the entire <i>Framework</i>.</p>
MM4	Policy SA13, page 43	<p><i>Modify policy SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill, for 300 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape-led masterplan, which respects responds to the setting of the South Downs National Park in its design, creating <p><i>Under Landscape Considerations:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site 	<p>The modification is necessary in response to the sensitive environmental context of the proposed housing allocation at SA13, which is located on the southern fringes of Burgess Hill.</p> <p>Within this area, special sensitivity is required to ensure that any potentially harmful impact of the proposed development on the setting of the South Downs National Park (SDNP) to the south is effectively mitigated.</p> <p>This modification brings the policy into line with national policy for</p>

		<p>layout, capacity and mitigation requirements, in order to minimise impacts on the most visible parts of the site on the wider countryside and the setting of and any potential views from the South Downs National park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect the dark night skies.</p> <ul style="list-style-type: none"> • The LVIA will incorporate the findings of the Opportunities and Constraints Plan, paying particular attention to the increasing sensitivity moving through the site towards the south, and acknowledge its position as an edge of settlement development to Burgess hill that reflects the characteristics of its immediate area. • The design will take account of and respond to the findings of the LVIA. 	<p>the National Parks, as expressed in paragraph 176 of <i>the Framework</i>.</p>
MM5	Policy SA7, page 27	<p><i>Modify policy SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second bullet point:</i></p> <ul style="list-style-type: none"> • Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB. 	<p>The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i>.</p>
MM6	Policy SA8, page 28	<p><i>Modify policy SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second Bullet Point:</i></p> <ul style="list-style-type: none"> • Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation 	<p>The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i>.</p>

		requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.	
MM7	Policy SA23, page 67	<p><i>Modify policy SA23: Land at Hanlye Lane to the East of Ardingly Road, Cuckfield, for 55 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a high quality, landscape led, sustainable extension to Cuckfield, which provides enhanced and accessible open space; respects the character of the village and conserves and enhances the setting of the High Weald AONB; 	The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i> .
MM8	Policy SA26, page 76	<p><i>Modify policy SA26: Land South of Hammerwood Road, Ashurst Wood, for 12 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and sits well within conserves and enhances the landscape and scenic beauty of the High Weald AONB <p><i>Under AONB:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to protect conserve and enhance the landscape and scenic beauty of the High Weald AONB. 	The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i> .
MM9	Policy SA27, page 78	<p><i>Modify policy SA27: Land at St Martin Close, Handcross, for 35 dwellings, as follows:</i></p> <p><i>Under Objectives, insert new first bullet point:</i></p> <ul style="list-style-type: none"> To deliver a high quality, landscape led, sustainable extension to Handcross, 	The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national policy, as expressed in paragraph 176 of <i>the Framework</i> .

		which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.	
MM10	Policy SA28, page 80	<p><i>Modify policy SA28: Land South of The Old Police House, Birchgrove Road, Horsted Keynes, for 25 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities. 	The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i> .
MM11	Policy SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a high quality, landscape-led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities. 	The site is located within the High Weald AONB, which has the highest status of protection within the planning system, and the modification brings the policy into line with national AONB policy, as expressed in paragraph 176 of <i>the Framework</i> .
MM12	Policy SA34, page 93	<p><i>Modify policy SA34: Existing Employment Sites</i></p> <p><i>After first paragraph, insert the following text:</i></p> <p>Development proposals outside the traditional</p>	The modification ensures the policy is both justified and effective in line with national policy for a strong, competitive economy, as expressed in paragraphs 81, 82 and 123 of <i>the Framework</i> , recognising that a balance has to be made between

		<p>employment use classes 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:</p> <p>(i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and</p> <p>(ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.</p> <p>Development proposals outside the traditional employment use classes 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 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.</p>	<p>ensuring adequate employment land for the longer term and not holding on inordinately to employment land which is no longer marketable as such.</p>
MM13	Policy SA35, page 96	<p><i>Modify policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, as follows:</i></p> <p><i>Amend fifth paragraph as follows:</i> New development in these areas should be carefully designed, having regard to matters such as building layout, noise insulation, landscaping, the historic</p>	<p>The modification ensures policy SA25 is in accordance with national policy on habitats and biodiversity, as expressed in Section 15 of <i>the Framework</i>.</p>

		environment, and means of access and meeting the requirement for biodiversity net gain.	
MM14	Policy SA37, page 103	<p><i>Modify policy SA37: Burgess Hill/Haywards Heath Multifunctional Network, as follows:</i></p> <p><i>Under third paragraph as follows:</i> The area shown on the Policies Map illustrates where policy SA37 will apply; the precise alignment for the scheme will be informed by detailed design work and it should be carefully designed having a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features.</p>	The modification ensures policy SA37 is in accordance with national policy on habitats and biodiversity, as expressed in Section 15 of <i>the Framework</i> .
MM15	Appendix B, page 141	<p><i>Modify Appendix B by inserting additional table, as set out below in Appendix 1, after the following text:</i></p> <p>The Council has identified some of the additional information it intends to record if it is available.</p>	The modification ensures the Plan is in accordance with national policy on habitats and biodiversity, as expressed in Section 15 of <i>the Framework</i> .
MM16	Housing Trajectory	<i>Include the Council's updated housing trajectory within the Plan.</i>	Paragraph 74 of <i>the Framework</i> states that all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. This Plan updates this information in the District Plan, and the inclusion of a housing trajectory in this Plan is therefore considered to be an appropriate tool for the effectiveness of the Plan.
MM17	Policy SA16, page 50	<p><i>Modify policy SA16: St Wilfrid's Catholic Primary School, School Close, Burgess Hill, for 200 dwellings, as follows:</i></p> <p><i>Under Urban Design Principles, at the end of the first bullet point, for 200 dwellings, insert:</i></p> <ul style="list-style-type: none"> The anticipated yield of the comprehensive redevelopment scheme includes the 200 dwellings proposed in policy SA16, plus an additional 100 dwellings proposed in the 	The modification provides the realistic estimate of the total number of houses to be provided within the comprehensive redevelopment area. This is in the interests of the positive preparation of this key brownfield site within Burgess Hill.

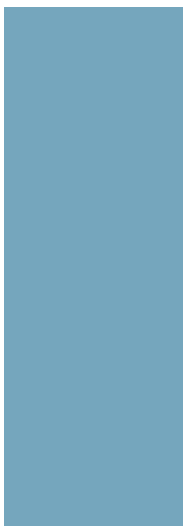
		Neighbourhood Plan for the Brow Quarter.	
MM18	Policy SA31, page 50	<p><i>Modify policy SA31: Land to the rear of Firlands, Church Road, Scaynes Hill, for 20 dwellings, as follows:</i></p> <p><i>Under Highways and Access, additional bullet point:</i></p> <ul style="list-style-type: none"> • Contribute towards provision of a footpath connecting the site to the existing footpath to the south. This could be done either as an extension to the Scaynes Hill Common footpath or exploring options for a formal footway alongside the carriageway. 	<p>The modification is necessary because a dedicated, convenient and safe pedestrian route from the proposed development into the village of Scaynes Hill is required in the interests of pedestrian safety and the positive preparation and effectiveness of the allocation. This accords with the requirements of paragraphs 104 (d) and 108 (b) of <i>the Framework</i>.</p>
MM19	SA14, page 46	<p><i>Modify policy SA14: Land to the South of Selby Close, Hammonds Ridge, Burgess Hill, for 12 flats, as follows:</i></p> <p><i>Under Highways and Access, first bullet point:</i></p> <ul style="list-style-type: none"> • Provide access from Hammonds Ridge. or through CALA Homes development at Edwin Street to the west, the details of which need to be investigated further. 	<p>The modification removes the indecision over which access is appropriate for the development, in the interests of the positive preparation and effectiveness of the allocation. The Hammonds Ridge option removes the need to remove any of the group TPO trees at the western end of the site.</p>
MM20	SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Highways and Access: Delete first bullet point and insert:</i></p> <ul style="list-style-type: none"> • Safe and convenient pedestrian and vehicular access needs to be secured, in accordance with Manual for Streets (MfS) to enable (a) satisfactory access by waste collection vehicles and emergency services vehicles; and (b) safe and convenient pedestrian access, both along Hamsland and into the proposed development. 	<p>The modification ensures that pedestrian safety is taken into account in the proposed development, in accordance with national policy to secure (and by inference maintain) high quality walking networks as expressed in paragraphs 104 (d) and 108 (b) of <i>the Framework</i>. The modification is also in line with the ethos of the July 2021 <i>Framework</i> as expressed in paragraph 128, to note the important contribution trees make to the character and quality of urban environments and to retain exiting trees wherever possible.</p>

		<p><i>Under Biodiversity and Green Infrastructure:</i> Add new bullet point:</p> <ul style="list-style-type: none"> • Ensure adequate protection of the existing trees along the site boundary. 	
MM21	SA22, page 65	<p><i>Modify policy SA22: Land North of Burleigh Lane, Crawley Down, for 50 dwellings, as follows:</i></p> <p><i>Under Highways and Access:</i></p> <ul style="list-style-type: none"> • Provide access from Sycamore Lane or Woodlands Close. Detailed access arrangements will need to be investigated further. 	<p>The modification is necessary to ensure certainty of delivery by requiring specification of the vehicular access to be via Sycamore Lane, so as to ensure delivery of the allocation within the plan period. This is to ensure the effectiveness of the allocation.</p> <p>If access cannot be demonstrated through agreement with the relevant landowner(s), then this allocation should be deleted from the Plan.</p>
MM22	SA20, page 61	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Biodiversity and Green Infrastructure:</i> Additional text at end of bullet point 6: The management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management.</p>	<p>It is important to assess the effectiveness of the Plan in relation to the proposal within policy SA20 to designate land for use as SANGS, including its role in protecting sites of national importance, such as the Ashdown Forest SAC and SPA from visitor pressures. This protection is in line with the requirements of national policy, as expressed in paragraph 179 of <i>the Framework</i>.</p>

Mid Sussex District Council



Site Allocations Development Plan Document



June 2022



Adoption version



MID SUSSEX
DISTRICT COUNCIL

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Foreword

To follow upon Adoption.

Executive Summary

Introduction

This document is the Main Modifications version of the emerging Site Allocations Development Plan Document (the Sites DPD).

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

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

Site Allocations

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

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

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

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

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

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

Settlement / Parish	Site Name	Policy Reference
Burgess Hill	Land South of 96 Folders Lane	SA12
	Land South of Folders Lane and East of Keymer Road	SA13
	Land South of Selby Close	SA14
	Land South of Southway	SA15
	St. Wilfrid's School	SA16
	Woodfield House, Isaacs Lane	SA17
East Grinstead	Former East Grinstead Police Station	SA18
	Land South of Crawley Down Rd	SA19
	Land South and West of Imberhorne Upper School	SA20
Haywards Heath	Land at Rogers Farm, Fox Hill	SA21
Crawley Down	Land North of Burleigh Lane	SA22
Cuckfield	Land at Hanlye Lane East of Ardingly Road	SA23
Hassocks	Land North of Shepherds Walk	SA24
Ardingly	Land West of Selsfield Road	SA25
Ashurst Wood	Land South of Hammerwood Road	SA26
Handcross	Land at St. Martin Close (West)	SA27
Horsted Keynes	Land South of The Old Police House	SA28
	Land South of St. Stephens Church	SA29
Sayers Common	Land to the North of Lyndon, Reeds Lane	SA30
Scaynes Hill	Land to the rear of Firlands, Church Road	SA31
Turners Hill	Withypitts Farm, Selsfield Road	SA32
Ansty	Ansty Cross Garage	SA33

Development Policies

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

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

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

- **SA36: Wivelsfield Railway Station** provides a policy which safeguards Land to the west of Wivelsfield Railway Station to support the delivery of a package of improvements at Wivelsfield Railway Station.
- **SA37: Burgess Hill/ Haywards Heath Cycle Network** provides a policy for the Burgess Hill/ Haywards Heath Multifunctional Network which supports the delivery of a programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill.
- **SA38: Air Quality** provides additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs. It also addresses potential air quality impacts for the Ashdown Forest SPA and SAC.
- **SA39: Specialist Accommodation for Older People and Care Homes** provides support for proposals that will contribute to meeting needs for these types of specialist accommodation provided that certain requirements set out in the policy are met.

Implementing the Plan

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

1 Introduction

What is the Site Allocations Development Plan Document?

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

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

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

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

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

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

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

The Development Plan

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

1.4 These documents are complemented by the remaining 'saved' policies of the Mid Sussex Local Plan (May 2004) and the Mid Sussex Small Scale Housing Allocations DPD (April 2008).

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

1.5 Neighbourhood Plans can be prepared by either town or parish councils, or a neighbourhood forum, and where adopted, also make up part of the Development Plan of the district. They can provide an important layer of planning for local areas and set out in more detail how a community wishes to see its area develop.

1.6 Where neighbourhood plans are prepared, they must be in general conformity with the Strategic Policies set out in the District Plan and Site Allocations DPD, i.e. District Plan (DP) Policies and Site Allocations (SA) Policies, and any Strategic Policies set out in future planning documents in accordance with the Neighbourhood Planning (General) Regulations 2012.²

1.7 The Council will continue to support communities who wish to prepare neighbourhood plans. Details of how the Council can help with the preparation of neighbourhood plans are set out on the Council's website.³

1.8 These documents together make up the Development Plan for the district (see Figure 1.1). All planning applications will be determined in accordance with the Development Plan taken as a whole, unless material considerations indicate otherwise.

1.9 The Council has also prepared a number of Supplementary Planning Documents (SPDs). These provide additional detail and guidance to existing policies. SPDs are a material consideration in planning decisions. Adopted SPDs are available to view online at <https://www.midsussex.gov.uk/planning-building/supplementary-planning-documents/>

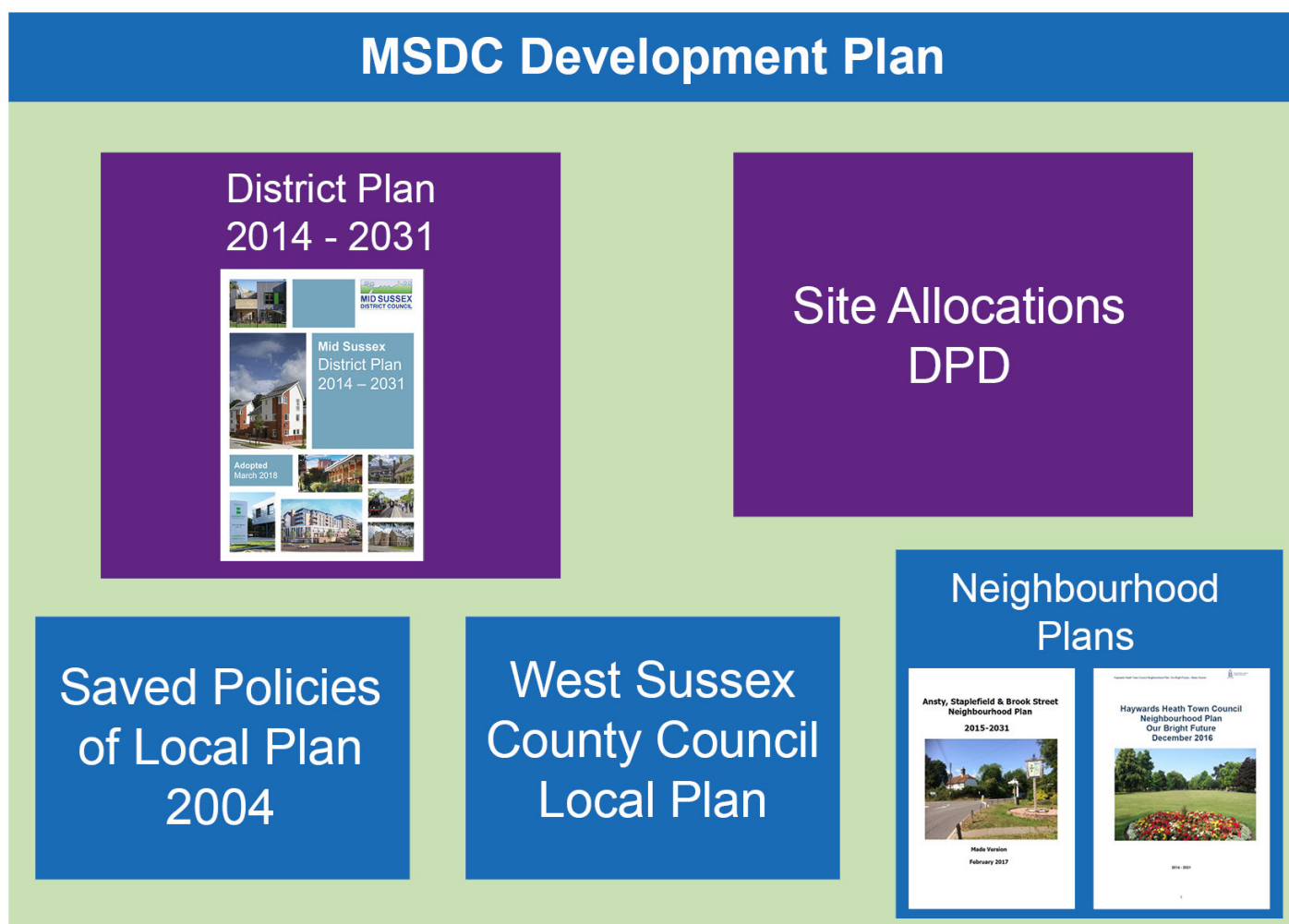


Figure 1.1: MSDC Development Plan

² The Neighbourhood Planning (General) Regulations 2012

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

How the Sites DPD has been Prepared

1.10 The Sites DPD has been prepared in compliance with the Planning and Compulsory Purchase Act 2004,⁴ and other relevant regulations.

1.11 Government planning policy and guidance is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The NPPF sets out the Government's planning policies for achieving sustainable development and is complemented by the PPG, which provides additional guidance for practitioners.

1.12 In particular, the NPPF states that Development Plan Documents should be prepared in accordance with the legal and procedural requirements. To be found to be 'sound', plans must be:

- a) positively prepared
- b) justified
- c) effective, and
- d) consistent with national policy.⁵

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

a) Positively prepared

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

“positively prepared - providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”

1.14 The Council has worked, and continues to work, in partnership with its neighbouring authorities under the Duty to Cooperate and has undertaken an ongoing process of Sustainability Appraisal to ensure that the Site Allocations Document delivers sustainable development.

1.15 The Sites DPD identifies additional site allocations to meet the objectively assessed development requirements for the district, plus the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area (HMA) to be addressed within Mid Sussex.

1.16 The Sites DPD is addressing the housing and employment need which has already been established by the District Plan and therefore these matters are not addressed in the Duty-to-Cooperate matters in the context of the Site Allocations document itself. Clearly these matters will be reviewed again in the future through the District Plan review process, which commenced in 2021.

1.17 Other important Duty to Co-operate matters for Mid Sussex include giving consideration to potential impacts on the South Downs National Park, High Weald Area of Outstanding Natural Beauty (AONB) and the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The National Park Authority, AONB Board and Natural England have all been engaged during the preparation of the plan and details of this are set out within the supporting papers

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⁴ Planning and Compulsory Purchase Act 2004

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

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

and Habitats Regulations Assessment Report.⁶ It is considered that the plan does not negatively affect these matters.

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

b) A justified plan:

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

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

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

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

c) An effective plan:

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

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

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

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

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⁶ Mid Sussex District Council (2020) Site Allocation Development Plan Document, Site Selection Paper 3: Housing Sites. Mid Sussex District Council (2020) Duty to Cooperate Statement. Habitats Regulations Assessment of the Mid Sussex Site Allocations Development Plan Document at Draft Plan Stage (2020).

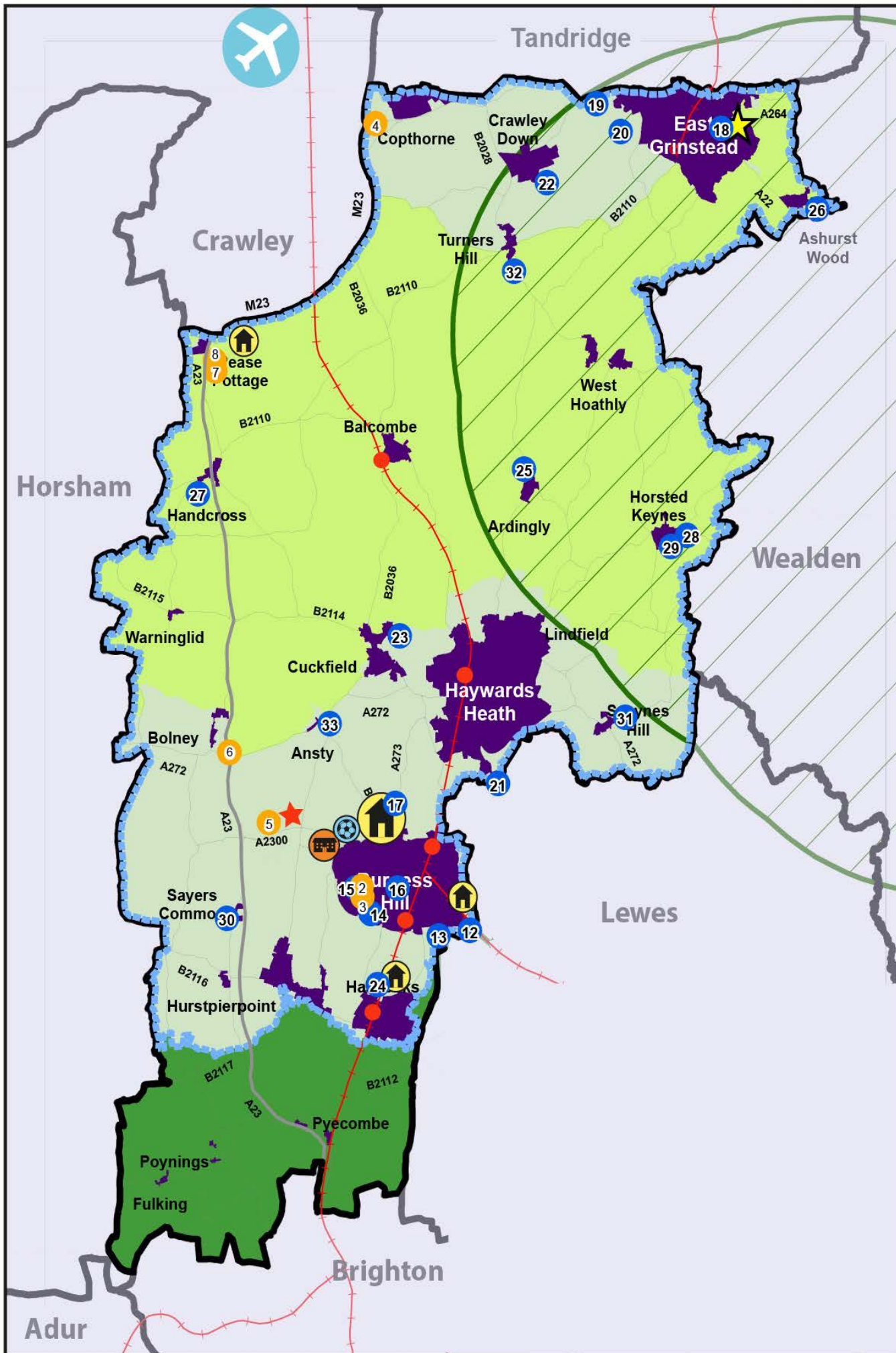
⁷ Mid Sussex District Council (2020) Site Allocations Document – Viability Review.

d) Consistent with National Policy:

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

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


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



Key

Site Allocations DPD Proposed Allocations



Employment Site Allocations

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

Science and Technology Park

	SA9	Land to the north of the A2300
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Housing Site Allocations

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

District Plan Policies

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

Constraints

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

General Principles for Site Allocations

2.1 Policy SA GEN: General Development Principles for Site Allocations provides an overview of the District Plan requirements that are relevant for all the sites along with requirements set out in Council Supplementary Planning Documents (SPDs), planning guidance or strategy documents that may relate to the development of a site and which should be addressed in detail at the planning application stage. These General Principles apply to all site allocations and are supplemented by site-specific requirements set out for each policy SA2-SA9 (employment) and SA12-SA33 (housing).

2.2 The Sites DPD is accompanied by an Infrastructure Delivery Plan (IDP). The provision of infrastructure is essential to support new homes, economic growth and the creation of sustainable communities. The IDP identifies the future infrastructure requirements as a result of anticipated future growth proposed within the Sites DPD. It sets out the likely infrastructure requirements and estimated contributions for each proposed site allocation based on engagement with infrastructure providers and key stakeholders (for example, West Sussex County Council, the Clinical Commissioning Group and utility providers).

SA GEN: General Principles for Site Allocations

Key Objectives

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

Urban design principles

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

Landscape considerations

- Undertake Landscape and Visual Impact Assessment or Appraisal (LVIA) on any rural and edge of settlement sites. In the AONB the LVIA will utilise the AONB Management Plan components as landscape receptors. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements.
- Development in the High Weald AONB or within its setting will need to conserve and enhance the natural beauty of the High Weald, as set out in the **High Weald Management Plan 2019-2024** and District Plan Policy **DP16: High Weald Area of Outstanding Natural Beauty**.
- Development within the setting of the South Downs National Park will need to be consistent with National Park purposes and special qualities, as set out in the **South Downs Local**

Plan and South Downs Partnership Management Plan and with District Plan Policy DP 18: Setting of the South Downs National Park.

- Provide a Landscape Strategy to identify how natural features on site have been retained and incorporated into the landscape structure and design of the site and informed the landscaping proposals for the site.
- Where development is required to adopt a landscape led approach, including all developments within the AONB or its setting; this includes respecting the local character of the area in built form by utilising appropriate architectural design, site layout and density which complements and contributes to the overall character and appearance of the area.
- Arboricultural Impact Assessment and Arboricultural Method Statements will be required for all sites where development will be within 5 metres of any trees.

Social and community

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

Historic environment and cultural heritage

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

Air Quality, Light, Noise and Amenity

- Investigate any potential adverse air, light and noise pollution impacts from the development itself and from neighbouring uses, ensuring that these are avoided, or appropriately mitigated, in accordance with District Plan Policy **DP29: Noise, Air and Light Pollution** and **SA38 relating to Air Quality** as set out in this **Site Allocations DPD**.

Biodiversity and Green Infrastructure

- Carry out and submit habitat and species surveys at the earliest opportunity in order to inform

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

Access and highways

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

Flood risk and drainage

- Provide a site-specific Flood Risk Assessment (FRA)/surface water drainage strategy in areas at risk from fluvial or surface water flooding to inform the site layout and any appropriate mitigation measures that may be necessary. Areas at risk of flooding should be avoided in the first instance.
- Undertake a sequential approach to site layout by avoid developing areas at risk of flooding including climate change allowance.
- Priority will be given to use of Sustainable Urban Drainage Systems (SuDS) principles and methods where possible to drain the surface water from the development. SuDS features shall be designed and managed to provide, where possible, an ecological and water quality enhancement, providing areas for amenity and recreation, in accordance with District Plan Policy **DP41: Flood Risk and Drainage** and the **West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water** and the **Mid Sussex Drainage Advice for Developers**.

Ashdown Forest

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

Utilities

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

Sustainability

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

Contaminated Land

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

Minerals Safeguarding

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

2 Site Allocations

Sustainable Economic Development

2.3 District Plan Policy **DP1: Sustainable Economic Development** seeks to support economic growth across the district to promote a place which is attractive to a full range of businesses; which provides opportunities for people to live and work in their community; and to deliver an estimated job growth of an average of 543 jobs per year for the period 2014-2031. DP1 describes how this requirement will be met and this includes encouraging the provision of high quality development of land and premises to meet the needs of 21st century businesses and encouraging inward investment.

2.4 Policy DP1 also allocated 25 hectares of land at Burgess Hill and set out a commitment to allocate further sites within the Sites DPD.

2.5 Employment projections are based on a number of factors and so they are sensitive to change, such as changes in the jobs and employment market and the impact of national policy/legal interventions such as Permitted Development for office to residential conversions.⁸

2.6 Updated employment evidence, commissioned by the Council to take account of updated employment forecast statistics identified a total requirement of around **35 to 40 hectares** is needed up to 2031.⁹

2.7 District Plan Policy DP1 allocated 25ha at Burgess Hill:

- **15ha** on a site named “The Hub”. This allocation is partly complete, with planning applications in place to deliver the remainder.
- **10ha** at the Northern Arc strategic development.

2.8 Since adoption of the District Plan in 2018, the approved masterplan for the Northern Arc concluded that it is only possible to bring forward 4ha of employment land within the site. However, two additional sites (Former Handcross Garden Centre, Handcross – 2.7ha; and Land west of Copthorne - 3.6ha) have received planning permission. This effectively makes up for the shortfall in employment land expected at the Northern Arc.

2.9 This therefore leaves a residual requirement of 10-15 hectares to be allocated within the Site Allocations Document.

2.10 The Sites DPD Policy **SA1: Sustainable Economic Development – Additional Site Allotments** allocates six additional sites for employment use, plus expansion at Bolney Grange Business Park, totalling approximately 17ha. The process for selecting these sites for allocation is set out in Site Selection Paper 4: Employment and Sustainability Appraisal.¹⁰

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

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

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

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

SA1: Sustainable Economic Development – Additional Site Allocations

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

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

- proposals follow a comprehensive approach involving the community, local planning authority, developer and other key stakeholders; and
- where development meets the requirements set out within **SA GEN: General Principles for Site Allocations** and the Policy Requirements (Policies SA 2 to 8) shown on the following pages; and
- are in accordance with the Development Plan taken as a whole.

Table 2.1: Additional Employment Site Allocations

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

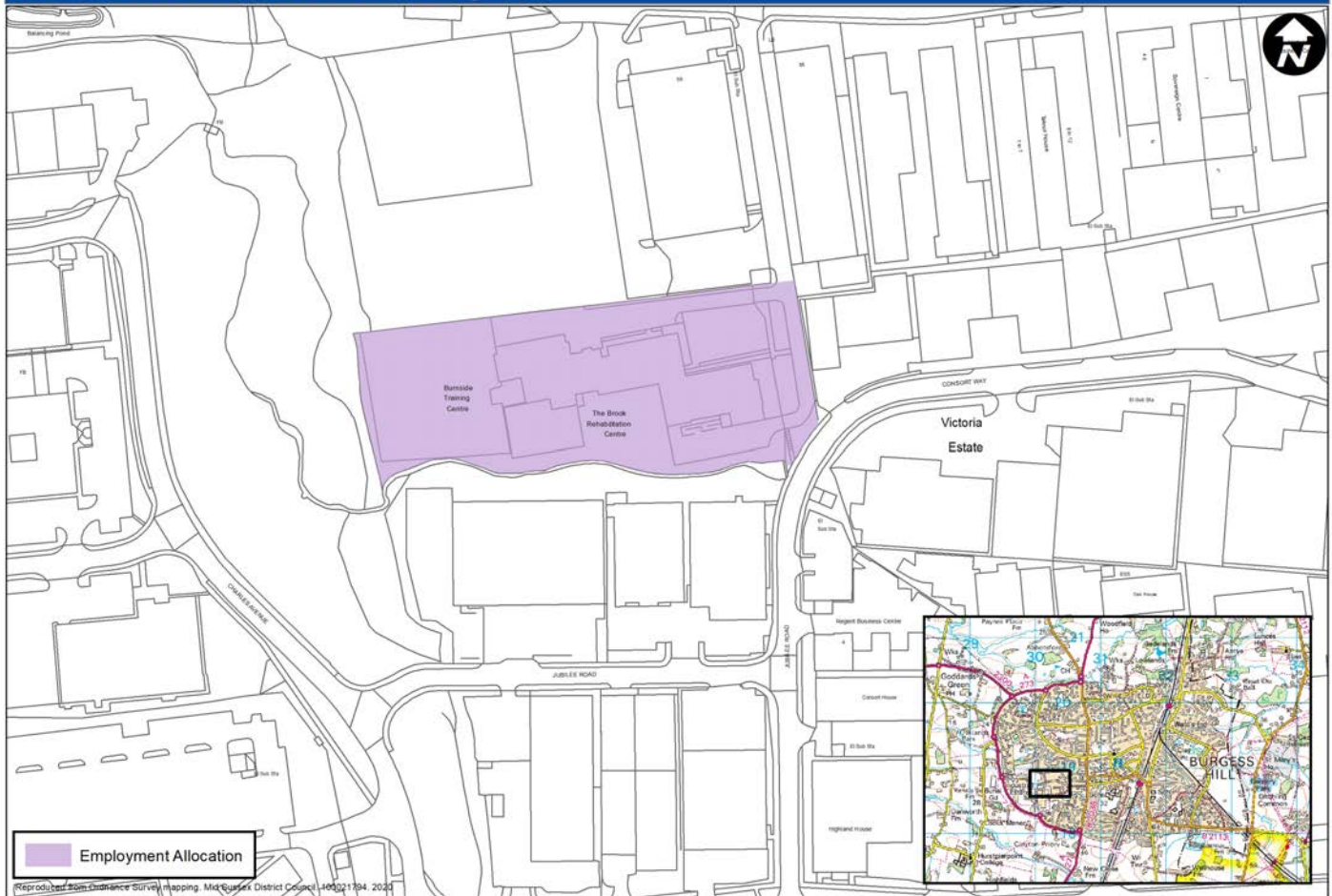
SA2: Burnside Centre, Victoria Road, Burgess Hill

SHELAA#: 826

Parish: Burgess Hill

Developable Area (ha): 0.96

SA2: Burnside Centre, Victoria Road, Burgess Hill



Allocation:

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

Site Specific Requirements:

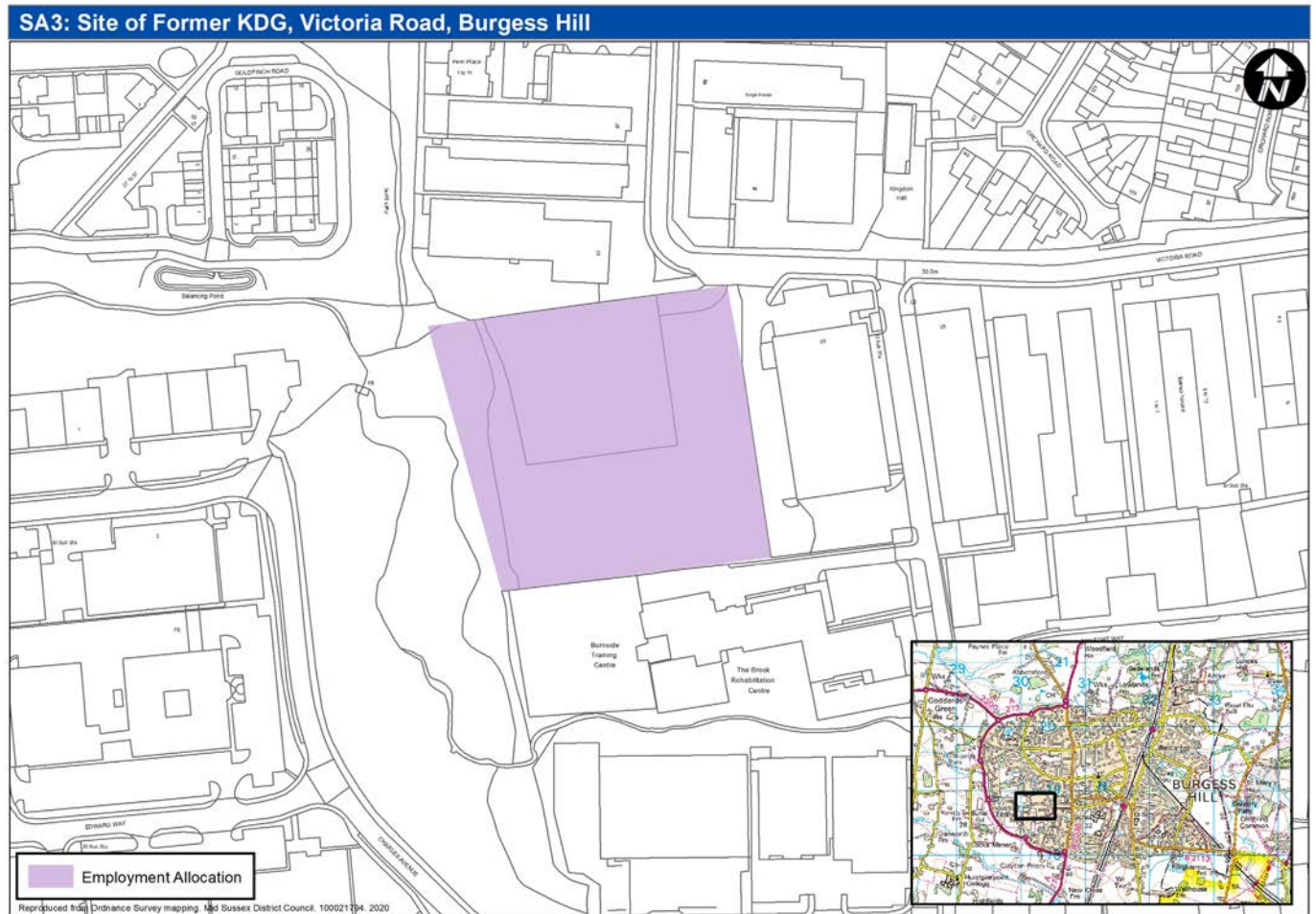
- Proposals must demonstrate that there is a mix of E(g)/B2 uses on-site, and clearly set out the justification for the quantum of development proposed for each use.
- This site is currently used as a centre for adults with learning difficulties. Development of this site should not commence until a replacement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

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

SHELAA#: 912

Parish: Burgess Hill

Developable Area (ha): 1.1



Allocation:

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

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

Site Specific Requirements:

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

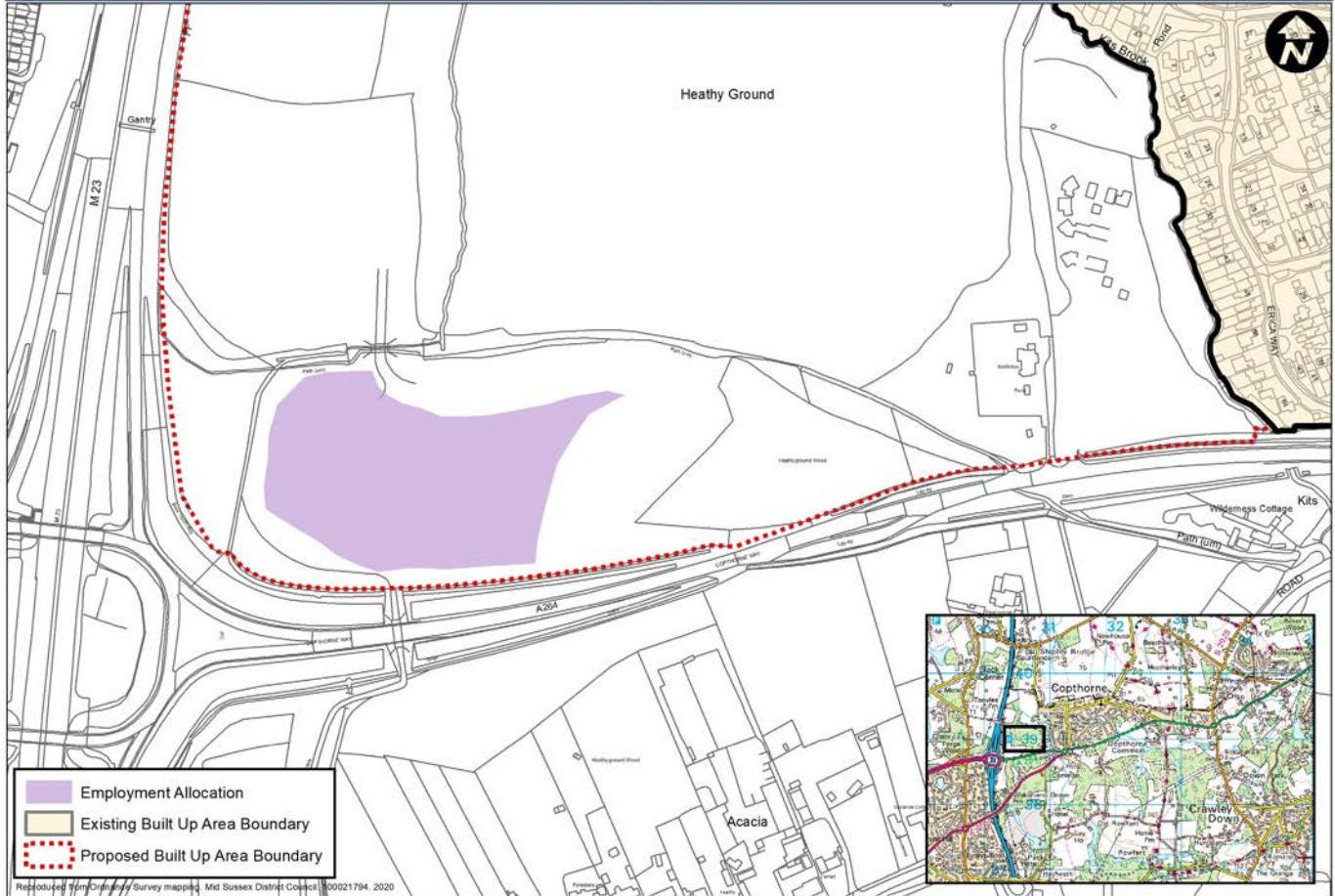
SA4: Land north of the A264 at Junction 10 of M23 (Employment Area)

SHELAA#: 940

Parish: Worth

Developable Area (ha): 2.7

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



Allocation:

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

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

Site Specific Requirements:

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

- Incorporate the permissive footpath/cycle path within the site layout or identify its relocation as part of the detailed design proposal.

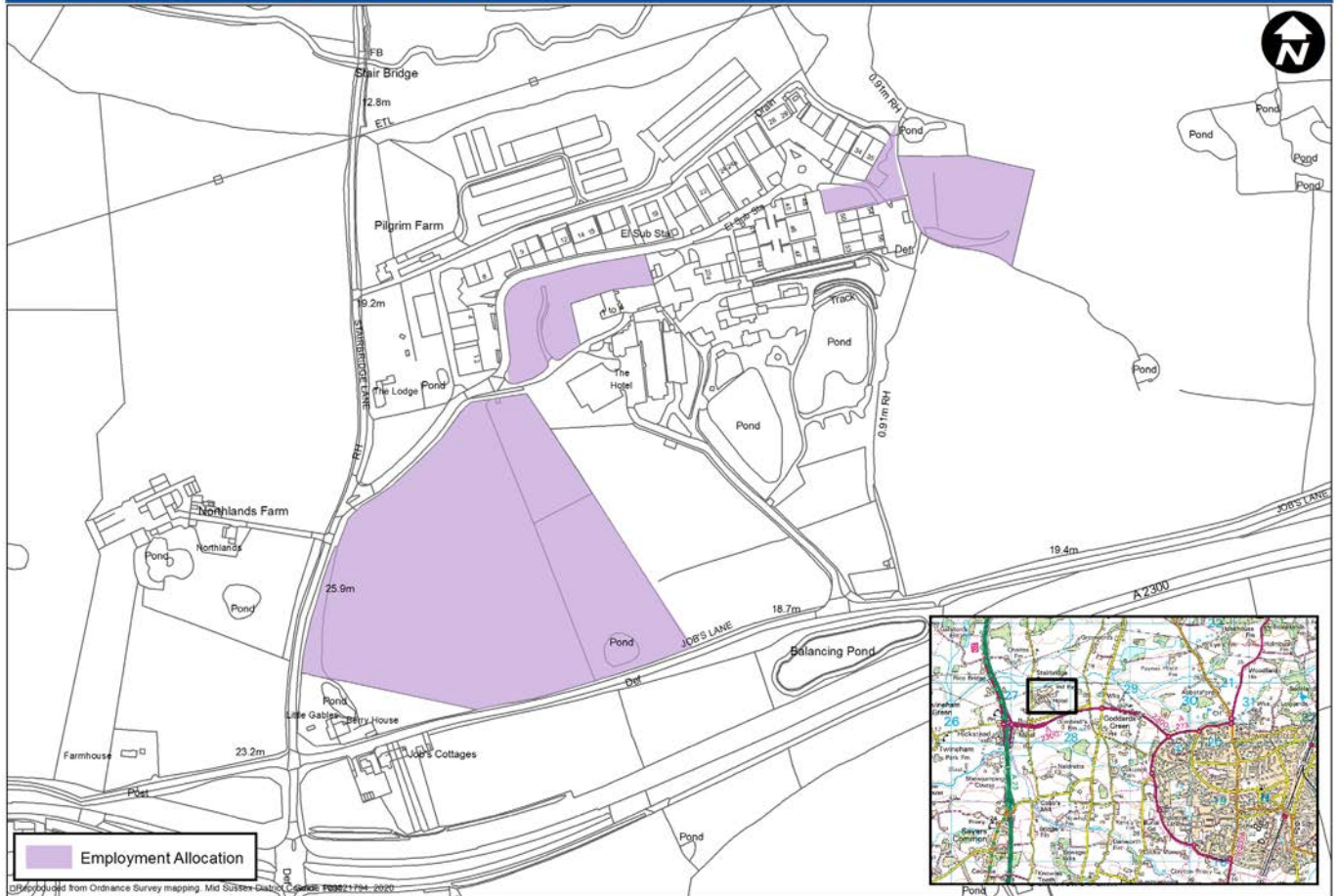
SA5: Land at Bolney Grange Business Park

SHELAA#: 24, 906, 907, 931

Parish: Bolney and Hurstpierpoint & Sayers Common

Developable Area (ha): 7

SA5: Land at Bolney Grange Business Park



Allocation:

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

Site Specific Requirements:

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

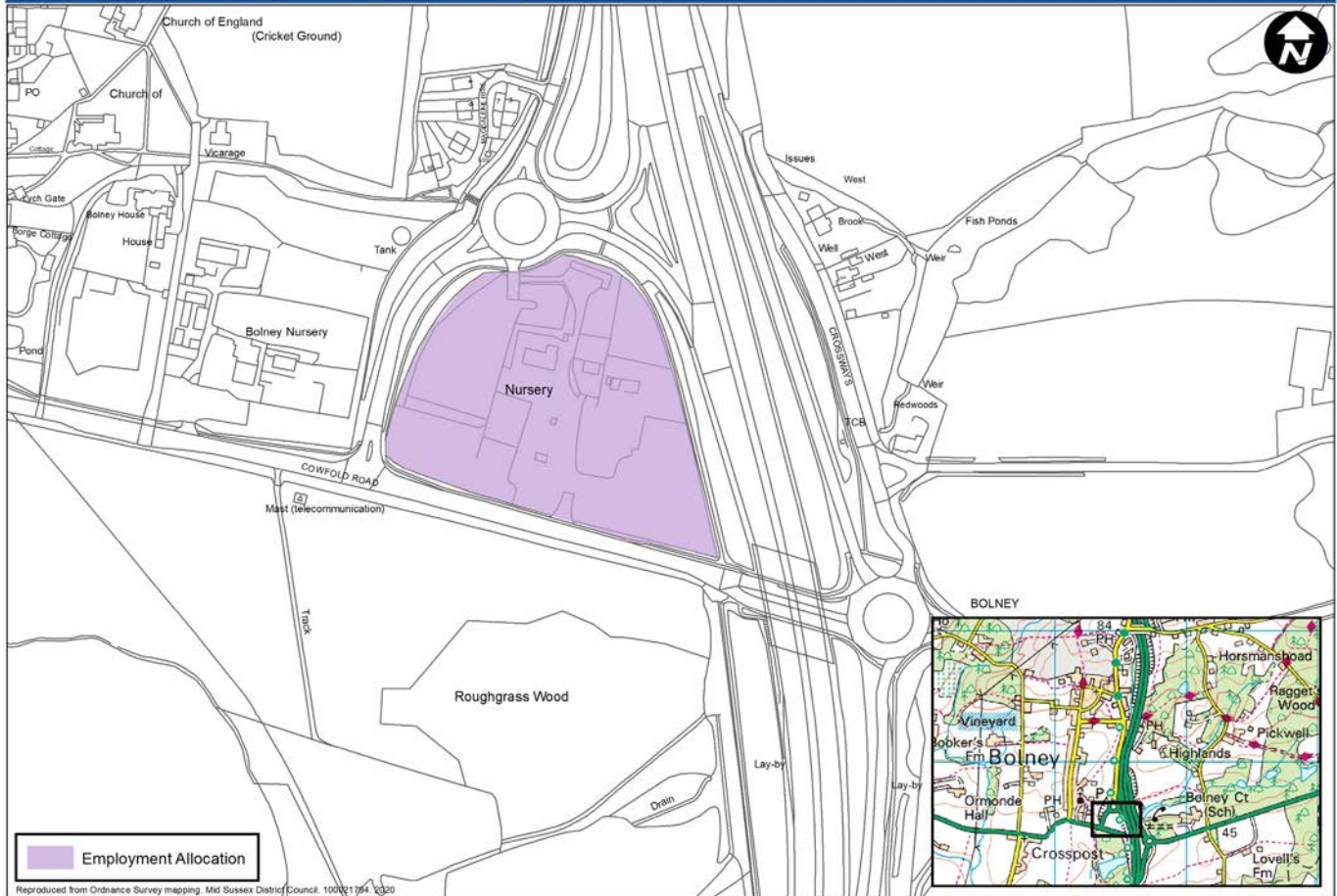
SA6: Marylands Nursey, Cowfold Road, Bolney

SHELAA#: 864

Parish: Bolney

Developable Area (ha): 2.4

SA6: Marylands Nursey, Cowfold Road, Bolney



Allocation:

Allocated for B8 (Storage and Distribution) employment uses.

Site Specific Requirements:

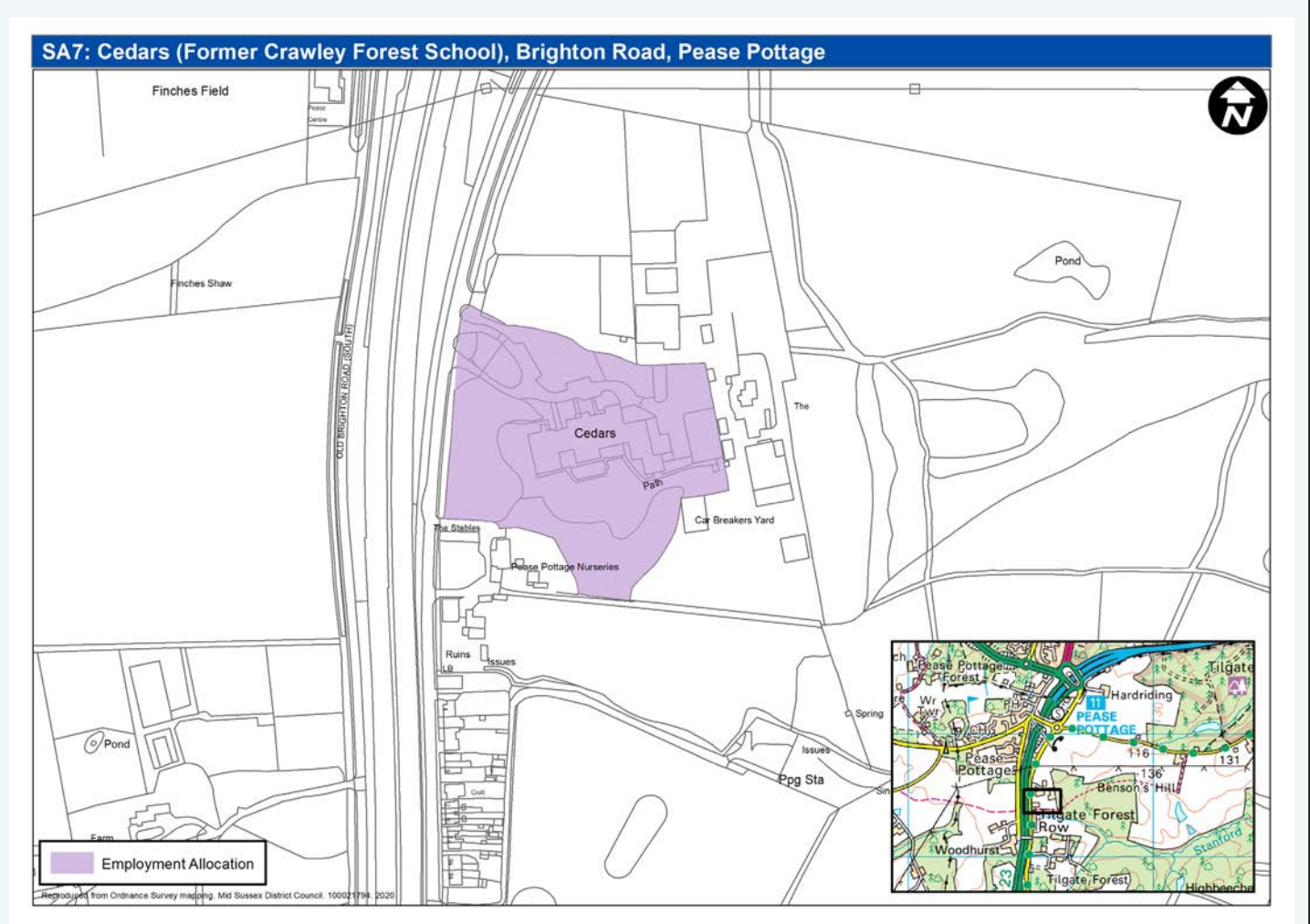
- Access should only be achieved using the existing access from the northern roundabout. Proposals should ensure no adverse impact on the junction with Cowfold Road, any adverse impacts must be mitigated.
- Proposals that include enabling non-business use classes in addition to business use will only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

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

SHELAA#: 888

Parish: Slaugham

Developable Area (ha): 2.3



Allocation:

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

Site Specific Requirements:

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

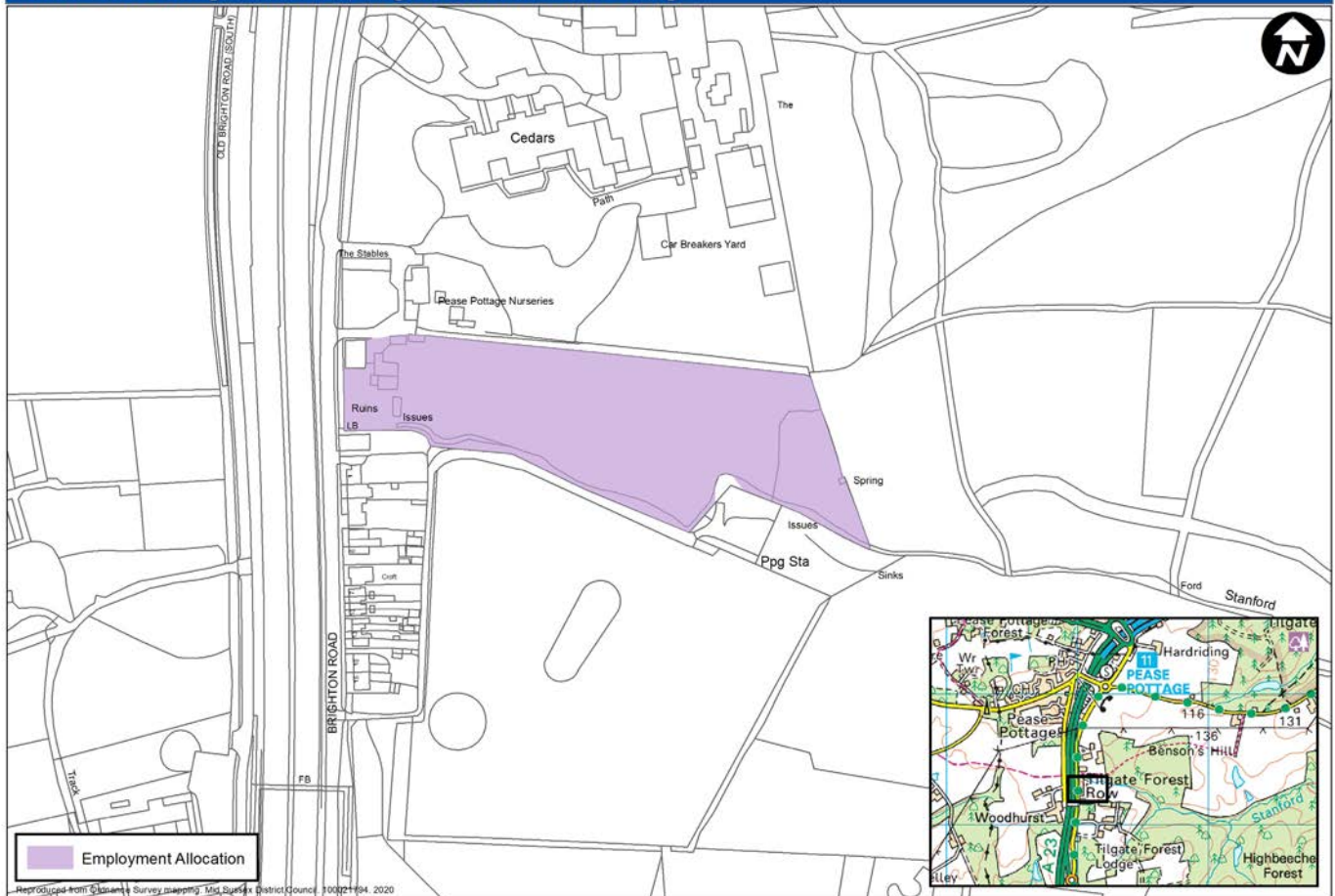
SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage

SHELAA#: 192

Parish: Slaugham

Developable Area (ha): 1

SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage



Allocation:

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

Site Specific Requirements:

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

- Proposals that include enabling non-business use classes in addition to business use will only be permitted where it has been clearly demonstrated with substantiated evidence, which may include a sequential test, impact assessment and viability assessment, that proposals for only business uses (E(g), B2 and B8) are not economically viable.

Science and Technology Park

2.11 One of the District Plan's key strategic issues is economic growth. The District Plan seeks to support sustainable communities and a robust local economy by encouraging opportunities for residents to work within their towns and villages. This aim is supported by the Council's Economic Development Strategy 2018-2031. Given the significant planned housing growth at Burgess Hill, it is important to supplement this with sufficient employment land within this location to ensure this aim can be met.

2.12 District Plan Policy **DP1: Sustainable Economic Development** identifies a broad location for a Science and Technology Park to the west of Burgess Hill, to support research and development and provide high quality employment for the wider area. The principle of the allocation and location itself was based upon a range of documents which assessed deliverability, market demand, feasibility and suitability.

2.13 The Coast to Capital Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) (2014) identified Burgess Hill as a strategic growth location. This was on the basis of the collective Northern Arc strategic development (3,500 homes), The Hub business park (creating approximately 1,000 new jobs) and the potential for the Science and Technology Park to provide 100,000m² of employment floorspace and 2,500 new jobs. The SEP supported the potential for the Science and Technology Park and recognised that it would impact positively on the wider region and beyond, supporting high end economic and business growth across the Coast to Capital and South East Local Economic Partnership areas.

2.14 The SEP was refreshed in 2018 (entitled Gatwick 360°) and continues to support proposals such as this through its eight economic priorities, in particular priorities related to the development of business infrastructure, investment in sustainable growth, creating skills for the future and pioneer innovation.

2.15 The Chilmark "Science and Technology Park: Potential Locations Assessment" concluded that there is a well-articulated strategic economic case, including significant opportunities for public economic investment support from the Greater Brighton City Deal, the Coast to Capital LEP and through the Gatwick Diamond for a Science and Technology Park in this location. It also concluded that the location benefitted from good strategic links with potential for future improvements to public transport, plus good visibility and prominence for the occupier and end-user market.

2.16 District Plan Policy DP1 identified a broad location to the west of Burgess Hill for a Science and Technology Park. Through the Council's SHELAA, two specific sites were promoted within this broad location. Site Selection Paper 4: Employment explains the Council's rationale for selecting the preferred site option for allocation which is set out in Site Allocation Policy SA9: Science and Technology Park.

SA9: Science and Technology Park

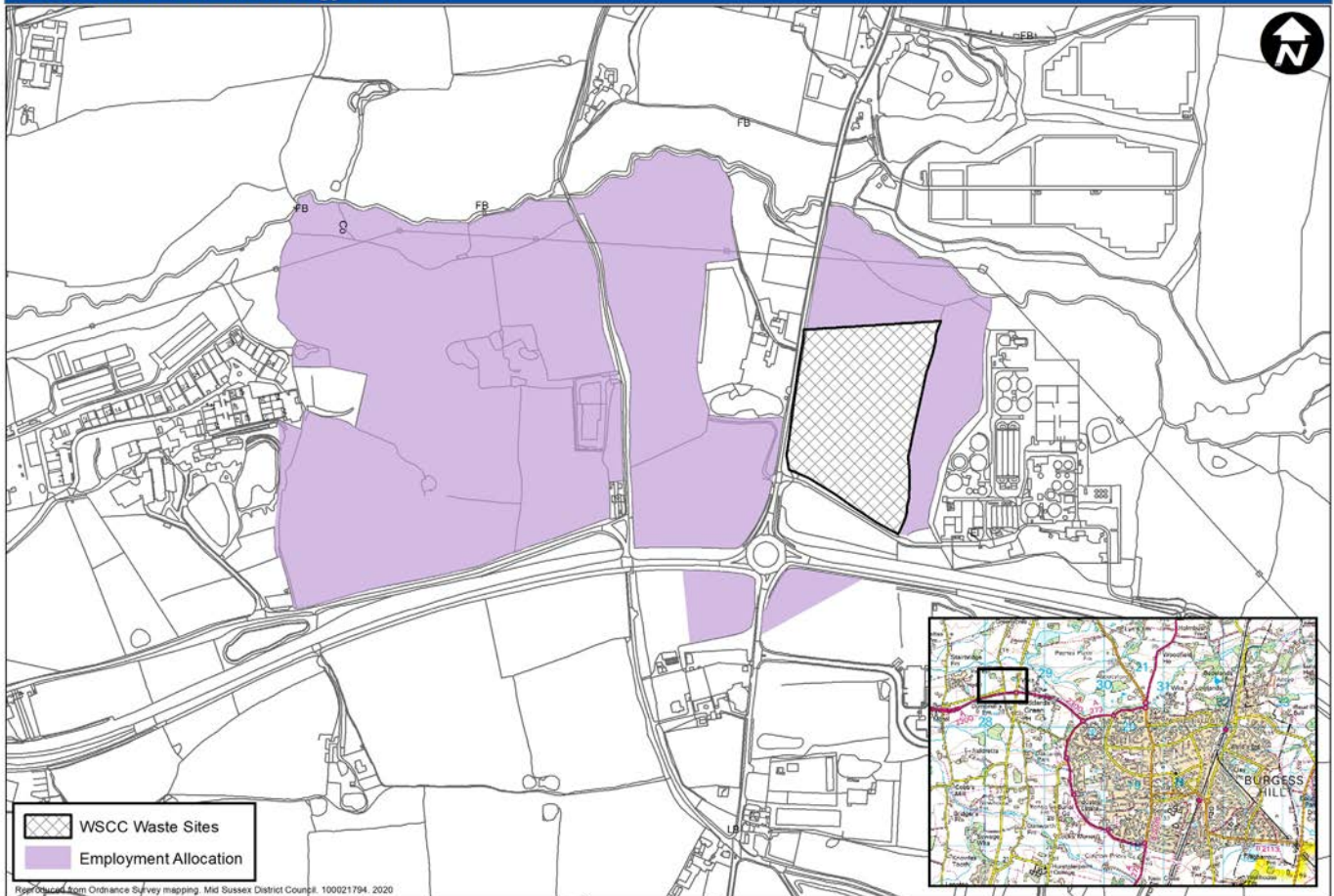
Land is allocated north of the A2300, as indicated on the policies map, for a Science and Technology Park.

SHELAA#: 949

Settlement: Burgess Hill

Gross Site Area (ha): 48.75

SA9: Science and Technology Park



Objectives

- Proposals will comprise employment accommodation capable of accommodating a minimum of approximately 2,500 jobs.
- Proposals must demonstrate that the development would comprise uses falling within the definition of a Science Park: a business support environment that encourages and supports the start-up, incubation and development of innovation-led, high-growth, knowledge-based businesses. This is alongside any appropriate ancillary uses required to serve the development and its employees (for example, but not limited to, a hotel, conference uses, gym, convenience store, crèche).
- Proposals in Use Class B8: Storage and Distribution will not be supported.

Phasing

- Development of the Science and Technology Park will progress in accordance with an allocation wide Masterplan and Phasing Strategy which will have been approved by the Local Planning Authority in consultation with the local Highways Authority and Highways England.
- Provide a detailed Phasing Strategy as part of any planning application, which sets out all transport mitigation required to enable each phase to be delivered, including measures to mitigate impacts on the local and Strategic Road Network.

- Development will then be brought forward in strict accordance with the approved Phasing Strategy.

Urban Design Principles

- Development must be of high quality design and layout, in accordance with DP26: Design.
- Landmark buildings should be located in prominent locations, to ensure high visibility from the A2300, where possible in accordance with Landscape, Biodiversity and Green Infrastructure Considerations.
- Provide and integrate high quality public realms, including public areas containing ancillary uses.
- Ensure the design is sensitive to the overhead power lines within the northern part of the site, including area of easement, and explore opportunities for their diversion or placement underground.
- Whilst within the same land ownership, the eastern parcel of the site is allocated for waste uses in the West Sussex Waste Local Plan 2014 (Policy W10) (2014). Ensure that the design of the site takes account of this allocation.
- Ensure that the design of the site takes account of nearby safeguarded waste uses, including the Goddards Green Waste Water Treatment Works to the east.

Landscape, Biodiversity and Green Infrastructure Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside to the south and to ensure the proposed development would not be dominant in the landscape.
- Retain the existing woodland to the east
- Retain and enhance existing mature trees and landscaping along the boundaries and within the site, incorporating them into the landscape structure and layout of the development.

Historic Environment and Cultural Heritage

- Archaeological pre-determination evaluation and appropriate mitigation may be required.

Sustainability

- Provision of electric vehicle charging points in accordance with the Council's adopted standards.
- Ensure the design would make the development future-ready for improvements in technology and sustainability such as (but not limited to) green technology, artificial intelligence and automation.

Highways and Access

- Provision of sustainable transport measures and other infrastructure requirements, including measures to mitigate impacts on the local and Strategic Road Network.
- The first priority is to mitigate development impacts by maximising sustainable transport interventions. Remaining impacts must be addressed through physical highway mitigation measures in consultation with the local Highways Authority and Highways England.
- Demonstrate that the development would not adversely affect the safe and efficient operation of the A23 and the A23/A2300 junction to the satisfaction of the local Highways Authority and Highways England.
- Demonstrate that access can be achieved to the satisfaction of the Highways Authority, minimising disruption and delay on the A2300 and surrounding roads.
- Provision of new bus routes or diversion of existing routes to connect with key hubs including railway and bus stations and Burgess Hill town centre.
- Provision of new pedestrian and cycle links to ensure connectivity with the Northern Arc, The Hub (south of A2300), Burgess Hill and surrounding countryside.
- Provision of pedestrian and cycle connectivity with Bolney Grange Business Park.
- Provision of car parking and cycle storage in accordance with the Council's adopted standards.

Flood Risk and Drainage

- The northern boundary of this site is within Flood Zones 2/3 and therefore should not be developed.
- A site-specific Flood Risk Assessment will be undertaken to inform the site layout and any appropriate mitigation measures that may be necessary.
- Proposals must incorporate Sustainable Drainage Systems (SuDS) as an integral part of the Green Infrastructure and open space proposals to mitigate flood risk and improve biodiversity and water quality.

Minerals

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

Housing Site Allocations

2.17 The District Plan 2014-2031 sets out the housing requirement for the district for the plan period of 16,390 dwellings. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.¹¹

2.18 The District Plan 2014-2031 establishes a 'stepped' trajectory for housing delivery with an average of 876 dwellings per annum (dpa) between 2014/15 and 2023/24 and thereafter an average of 1,090 dpa between 2024/25 and 2030/31. The increased trajectory, from 2024/25, is subject to there being no further harm to the integrity of the European Habitats Sites in Ashdown Forest, which is discussed further below.

2.19 The stepped approach is used for the purposes of calculating the five-year housing land supply.

2.20 On the basis that the housing requirement for Mid Sussex has been established in the District Plan, the Sites DPD is addressing the residual necessary to meet the existing, and agreed, housing requirement for the plan period up to 2031, including the agreed quantum of unmet housing need to be addressed within Mid Sussex up to 2031.

2.21 The District Plan Policy **DP5: Planning to Meet Future Housing Need** sets out a commitment for the Council to continue to work under the 'Duty-to-Cooperate' with all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Area (HMA), continuing to prioritise the Northern West Sussex HMA, which is established as the primary HMA for Mid Sussex.

2.22 DP5 makes it clear that the approach will ensure that consideration for future unmet need will be considered through a robust plan-making process as part of the review of the District Plan which is scheduled to commence in 2020.

Strategy for Delivery of District Plan Housing Requirement

2.23 Housing supply in Mid Sussex is made up of a number of sources, which include:

- Strategic allocations set out within the District Plan 2014-2031
- Additional allocations set out within the Sites DPD
- Retained Local Plan (2004) allocations
- Sites allocated in Small Scale Housing Allocations DPD (2008)
- Sites allocated within neighbourhood plans
- Sites not yet identified that will come forward through the development management process in accordance with policies set out in the Development Plan taken as a whole, these are often referred to as 'windfalls'.

2.24 The District Plan 2014-2031 allocates four strategic allocations, which made provision for around 5,080 dwellings to be delivered in the plan period up to 2031 (Table 2.2).

.....

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

Table 2.2: District Plan 2014 – 2031: Strategic Allocations

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

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

2.25 The District Plan also sets out the Spatial Strategy for Mid Sussex and focuses the majority of housing and employment development at Burgess Hill as it has the greatest potential to deliver sustainable communities and to benefit from the opportunities that new development can deliver than at the district's other two main towns (East Grinstead and Haywards Heath). Two sites are allocated at Burgess Hill, land to the north and north-west of Burgess Hill and at Kings Way.

2.26 A smaller scale of strategic development was also allocated at Pease Pottage, and at Hassocks to complement the overall strategy, the remainder of development will be delivered at sustainable developments to be informed by the Settlement Hierarchy (DP 6) to support economic, infrastructure and social needs whilst maintaining the settlement pattern and protecting the quality of the rural and landscape character of the district.

2.27 The delivery of the Strategic Allocations set out in the District Plan have progressed well with building under way on the Kingsway site and the Pease Pottage site, outline planning consent granted for the other schemes. However, there have been some changes in the number of units expected to be delivered within the plan period up to 2031 for strategic development at Burgess Hill with the amended delivery up to 2031 for District Plan allocations anticipated to be 3,287 dwellings.

2.28 Windfall sites are those not specifically identified in the development plan. The Council's Windfall allowance is updated to reflect changes in national policy and District Plan Policy DP6 that supports development of up to 9 dwellings that are contiguous to existing Settlement Boundaries and is based on past performance. The allowance is therefore increased from considering development schemes of 1 to 5 dwellings to 1 to 9 dwellings and so is increased from 45 dwellings per year to 84 dwellings per year. This equates to a windfall allowance of 420 dwellings for years six onwards for the rest of the plan period up to 2031.

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

2.29 The revised housing supply figures set out in Table 2.3, illustrates that following consideration for updated completion, commitments and windfall figures that the residual currently necessary to fully meet the district housing requirement is 797 dwellings as at 1st April 2021.

2.30 The Sites DPD allocates 22 sites to meet the residual necessary to meet the agreed housing requirement for the plan period as reflected in the 'stepped trajectory' and in accordance with the District Plan. This is important to ensure the Council can continue to maintain a five-year housing land supply.

2.31 The Site Allocations Policy **SA10: Housing** updates and complements District Plan Policy **DP4: Housing** and provides context for the residual necessary for the Sites DPD to address. The Site Allocations Policy **SA11: Additional Housing Allocations** identifies the sites that are allocated to meet the residual housing requirement addressed by the Sites DPD.

2.32 The Habitats Regulations require that the competent authority (Mid Sussex District Council) assesses the effects of land use plans to determine if there will be an adverse effect on the ecological integrity of a European site as a result of the plan's implementation, either on its own or in combination with other plans or projects. The European sites of interest to Mid Sussex District are the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), which are located within neighbouring Wealden District.

2.33 A Habitats Regulations Assessment (HRA) has been undertaken to assess the Site Allocations DPD. The main potential impacts of the Site Allocations DPD are recreation impacts primarily relating to risks to the Ashdown Forest SPA and air quality impacts primarily relating to risks to the Ashdown Forest SAC. The HRA considers the existing approach to mitigation for recreation impacts and the options for future mitigation. The HRA considers the air quality modelling results in relation to the wider context of a long-term trajectory of air quality improvements and transport mitigation measures. Using evidence-based justifications, the HRA has concluded, at this stage of plan-making, that the Site Allocations DPD does not present any potential risks to the Ashdown Forest SPA and SAC that are not capable of being mitigated.

SA10: Housing

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

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

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

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

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

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

Table 2.3: District Plan Housing Requirement (updated)

District Plan minimum Requirement	16,390
Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Completions 2017/18	843
Completions 2018/19	661
Completions 2019/20	1003
Completions 2020/21	1,116
Total Housing Commitments (including sites with planning permission and allocations in made Neighbourhood Plans)	9, 140
Windfall	420
Residual Housing Requirement	797

Site Allocations - Housing Supply

Site Allocations DPD - Allocations (SA11)	1,704
Total District Plan period (2014 - 2031) Supply	17,297
Over-supply with the District Plan period 2014 - 2031	+907

SA10: Housing (continued)

Table 2.4: Spatial Distribution of Housing Requirement

Settlement category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Hayward's Heath	10,653	706	1,379
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks and Keymer Hurstpierpoint Lindfield	3,005	198	105
3 – Medium Sized Village	Albourne Ardingly Ashurst Wood Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	208
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warninglid	82	5	12
5 – Hamlets	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walsted	N/A *	N/A *	N/A *
Total		16,390**	1,280	1,704

* Assumed windfall growth only

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

SA11: Additional Housing Allocations

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

Table 2.5: Sites DPD Housing Allocations

Settlement Type	Settlement	Site Name	Policy Reference	Number of Dwellings	
				Site	Category
Category 1 - Town	Burgess Hill	Land South of 96 Folders Lane	SA12	40	1,409
		Land South of Folders Lane and East of Keymer Road	SA13	300	
		Land South of Selby Close	SA14	12	
		Land South of Southway	SA15	30	
		St. Wilfrid's School	SA16	200	
		Woodfield House, Isaacs Lane	SA17	N/A (30)	
	East Grinstead	Former East Grinstead Police Station	SA18	22	
		Land South of Crawley Down Rd	SA19	200	
		Land South and West of Imberhorne Upper School	SA20	550	
	Haywards Heath	Land at Rogers Farm, Fox Hill	SA21	25	
Category 2 – Larger Village (Local Service Centre)	Crawley Down	Land North of Burleigh Lane	SA22	50	105
	Cuckfield	Land at Hanlye Lane East of Ardingly Road	SA23	55	
	Hassocks	Land North of Shepherds Walk	SA24	N/A (130) ^a	
Category 3 – Medium Sized Village	Ardingly	Land West of Selsfield Road	SA25	35	238
	Ashurst Wood	Land South of Hammerwood Road	SA26	12	
	Handcross	Land at St. Martin Close (West)	SA27	35 (65) ^b	
	Horsted Keynes	Land South of The Old Police House	SA28	25	
	Horsted Keynes	Land South of St. Stephens Church	SA29	30	
	Sayers Common	Land to the North of Lyndon, Reeds Lane	SA30	35	
	Scaynes Hill	Land to the rear of Firlands, Church Road	SA31	20	
	Turners Hill	Withypitts Farm, Selsfield Road	SA32	16	
Category 4 – Smaller Village	Ansty	Ansty Cross Garage	SA33	12	12
Total				1,704	1,704

- a – Planning permission has been granted on this site and it is now a commitment as at 1st April 2020. Therefore, no yield counted here to avoid double counting, although the allocation is to be retained for 130 dwellings.
- b – Slaugham Neighbourhood Plan is now made and Land at St Martin Close (east) for 30 units is now a commitment as at 1st April 2020. Therefore only 35 units are counted here to avoid double counting.
- c- Planning permission has been granted on this site and it is now a commitment as at 1st April 2021. Therefore, no yield

Individual Housing Allocation Policies

2.34 This section contains the site-specific policies for each housing site that is allocated in this Sites DPD. The site-specific policies are set within a template for each site that identifies key objectives and site specific policy requirements relating to issues such as urban design, landscape, historic environment, highways and access, green infrastructure, biodiversity, social and community, and flood risk and drainage.

2.35 The site-specific policies are accompanied by a series of general principles which are common to all the sites and are set out in **SA GEN: General Principles for Site Allocations**. Both the site-specific policies and the general principles highlight the issues that should be addressed in detail at the planning application stage. They should be read alongside the National Planning Policy Framework and Planning Practice Guidance, and the Development Plan taken as a whole, which includes neighbourhood plans.

2.36 In bringing forward the additional housing sites, the Council will expect to see high quality developments, in accordance with the National Planning Policy Framework and District Plan Policy **DP26: Character and Design** that are sustainable in the long term, and that integrate with and contribute to the existing settlement.

2.37 The Council has prepared a Mid Sussex Design Guide which is adopted as a Supplementary Planning Document (SPD) and looks specifically at enhancing local distinctiveness, as well as ensuring high quality, sustainable development. The design principles in this SPD will be treated as a material consideration in the assessment of all future planning schemes.

2.38 Individual applications for the site allocations should be accompanied by:

- a detailed Design and Access Statement that sets out the vision and overall masterplan for the site, demonstrating a commitment to creating a successful place, with well-designed new homes and supporting infrastructure;
- a Development Delivery Agreement which shows the proposed programme of house building, and demonstrates the number of homes the development will contribute to the District's five-year housing land supply; and
- a Statement of Community Involvement that sets out how the Town/Parish Council and other local organisations have been involved in the master planning process and infrastructure requirements.

2.39 Community involvement and consultation is key to ensuring that appropriate facilities are identified and designed to meet the needs of those who will use them. Community engagement and involvement is also essential for ensuring that new residents integrate with existing communities.

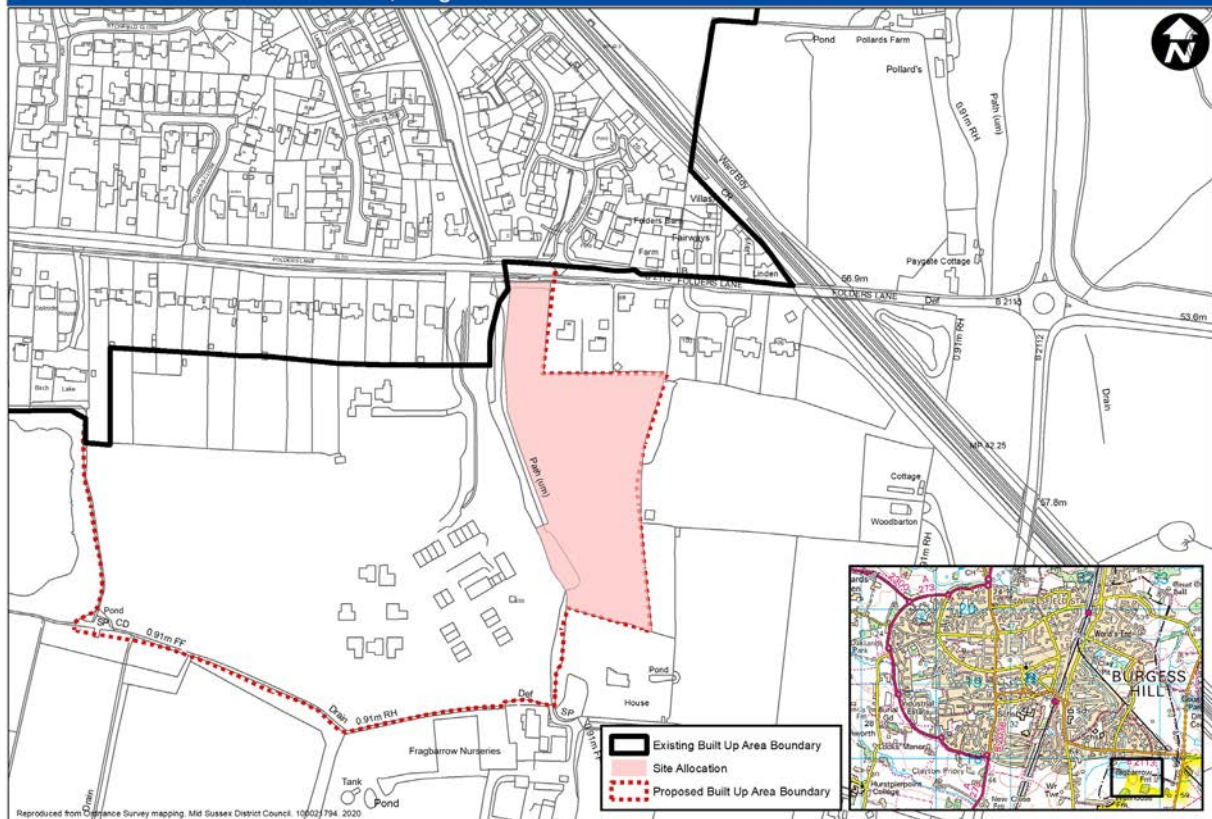
2.40 While the site-specific allocation policies identify some of the key requirements for development at each site, they do not preclude other requirements being identified at a later date. The Infrastructure Delivery Plan (IDP) identifies likely infrastructure requirements and is a live document that should be read in conjunction with the site-specific policies.

2.41 West Sussex County Council has responsibility for some of the infrastructure or services identified, such as schools and transport. Detailed requirements for these elements will need to be

SA 12 Land South of 96 Folders Lane, Burgess Hill

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

SA12: Land South of 96 Folders Lane, Burgess Hill



Objectives

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

Urban Design Principles

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

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts on the wider countryside and the setting of and any potential views from the South Downs National Park to the south.
- Any external lighting scheme shall be designed to minimise light spillage to protect dark night skies.
- Retain and substantially enhance existing landscape structure; safeguarding existing trees covered by Tree Preservation Orders along the north boundary of the site and, integrating existing hedge and tree boundaries, with new native tree planting throughout the layout, to contain new housing and limit the impact on the wider landscape.
- Protect and enhance the character and amenity of the existing PRow to the west of the site; including reinforcing the adjacent boundary with native tree planting and species-rich hedgerow, and providing connections through the new development.

Historic Environment and Cultural Heritage

- Establish the need for pre-determination evaluation and appropriate mitigation.
- Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including; retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with connections to the surrounding landscape.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.

Highways and Access

- A Sustainable Transport Strategy will be required identifying sustainable transport infrastructure improvements, demonstrating how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
- Mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered.
- Investigate access arrangements onto Folders Lane and sharing access with the adjacent development to the west; make necessary safety improvements to provide appropriate visibility, pedestrian footways and suitable pedestrian crossing facilities.

Flood Risk and Drainage

- Informed by a site specific Flood Risk Assessment (FRA), mitigation measures are required to address flood risk and existing surface water flooding in the northern part of the site adjacent to Folders Lane. Avoid developing areas at risk of surface water flooding.
- Surface Water Drainage to be designed to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.

Minerals

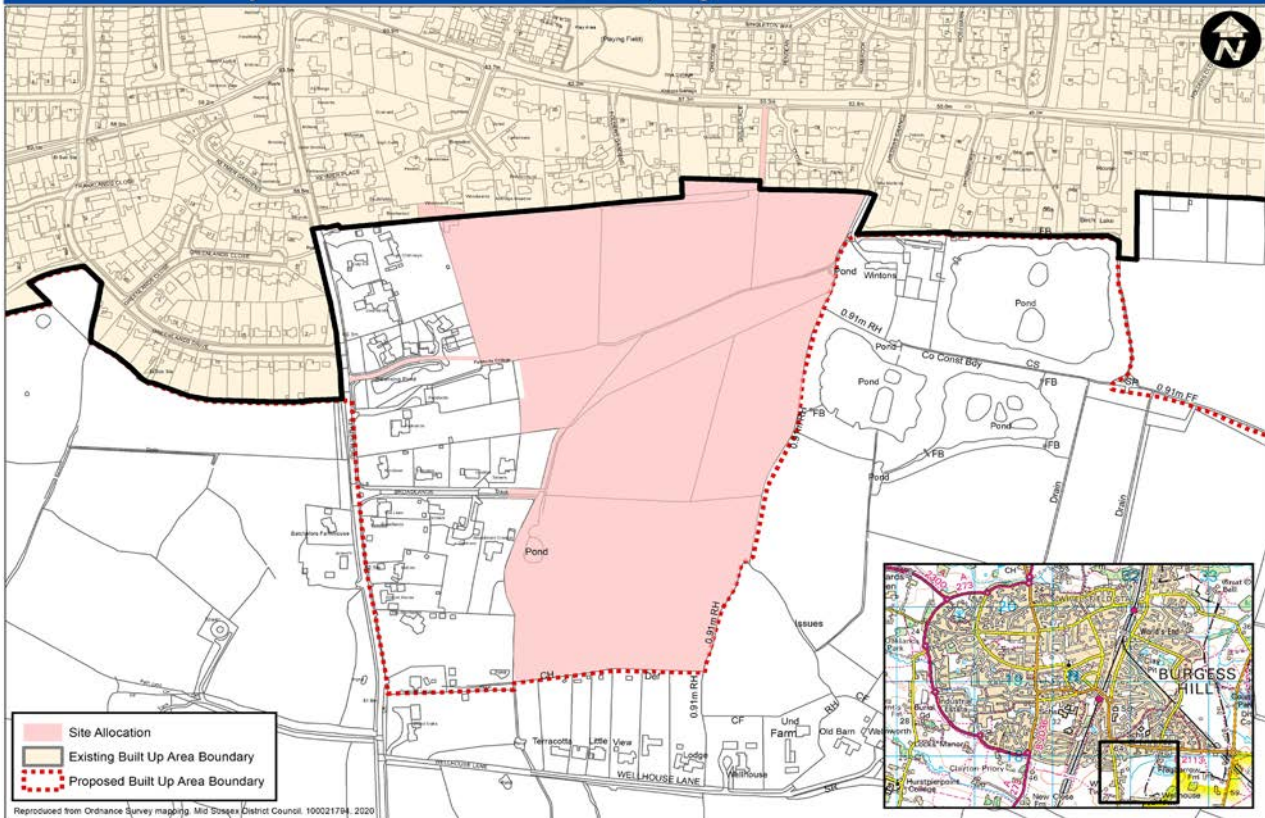
- The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 13

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

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

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



Objectives

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

Urban Design Principles

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

- Orientate development to have a positive edge to proposed open space and to the countryside by fronting onto retained field boundaries/ mature trees.

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts on the most visible parts of the site on the wider countryside and the setting of and any potential views from the South Downs National Park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect dark night skies.
- The LVIA will incorporate the findings of the Opportunities and Constraints Plan, paying particular attention to the increasing sensitivity moving through the site towards the south, and acknowledge its position as an edge of settlement development to Burgess Hill that reflects the characteristics of its immediate area.
- The design will take account of and respond to the findings of the LVIA.
- Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.
- Retain and substantially enhance existing landscape structure, particularly along the southern and eastern boundary. Safeguard mature trees and landscaping along the boundaries, within the site and along historic field boundaries, incorporating them into the landscape structure and layout of the development with new native tree planting throughout the layout, to contain new housing and limit the impact on the wider landscape.
- Protect the character and amenity of the existing PRow to the south of the site.

Social and Community

- Provide a suitably managed and designed on site public open space, equipped children's playspace/kickabout area.
- Mitigate increased demand for formal sport to the satisfaction of the Local Planning Authority.

Historic Environment and Cultural Heritage

- Provide appropriate layout, design and landscaping, particularly within the north west corner of the site, to protect the rural setting of the Grade II Listed High Chimneys, ensuring development is not dominant in views from the building or its setting and by reinforcing the tree belt on the western boundary.
- Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including; retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape.
- Provide a Habitat Management Plan detailing conservation and enhancement of all areas of Habitat of Principle Importance (HPI) (woodland, hedgerows and standing water); this shall include retention of a minimum of a 5 metre buffer around the HPI.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.

Highways and Access

- A Sustainable Transport Strategy will be required identifying sustainable transport infrastructure improvements, demonstrating how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
- Provide vehicular access onto Keymer Road and make any necessary safety improvements; access(es) shall include a pedestrian footway connecting to existing footpaths on the highway.
- Mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered.
- Provide good permeability across the site with attractive and convenient pedestrian and cyclepath access connecting onto Folders Lane and Keymer Road to improve links to existing services in Burgess Hill.

Flood Risk and Drainage

- Informed by a Flood Risk Assessment (FRA), measures are required to address flood risk associated with the site and in particular the watercourse which runs across the site and down the western boundary. Avoid developing areas adjacent to the existing watercourse and those at risk of surface water flooding.
- Surface Water Drainage to be designed to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.

Minerals

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

Utilities

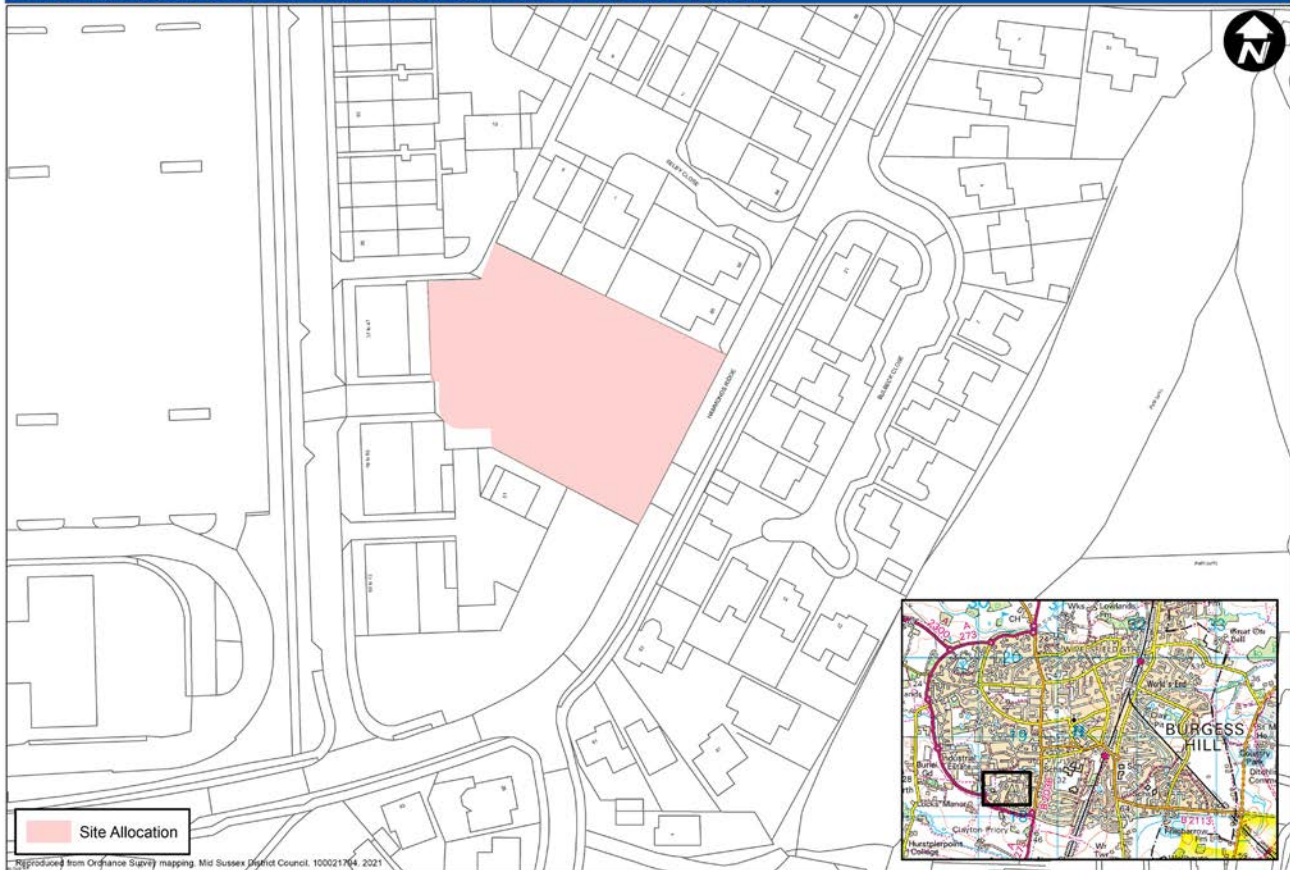
- Provide necessary water infrastructure reinforcement on Keymer Road.
- Occupation of development will be phased to align with the delivery of necessary sewerage infrastructure, in liaison with the service provider.

SA 14

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

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

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



Objectives

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

Urban Design Principles

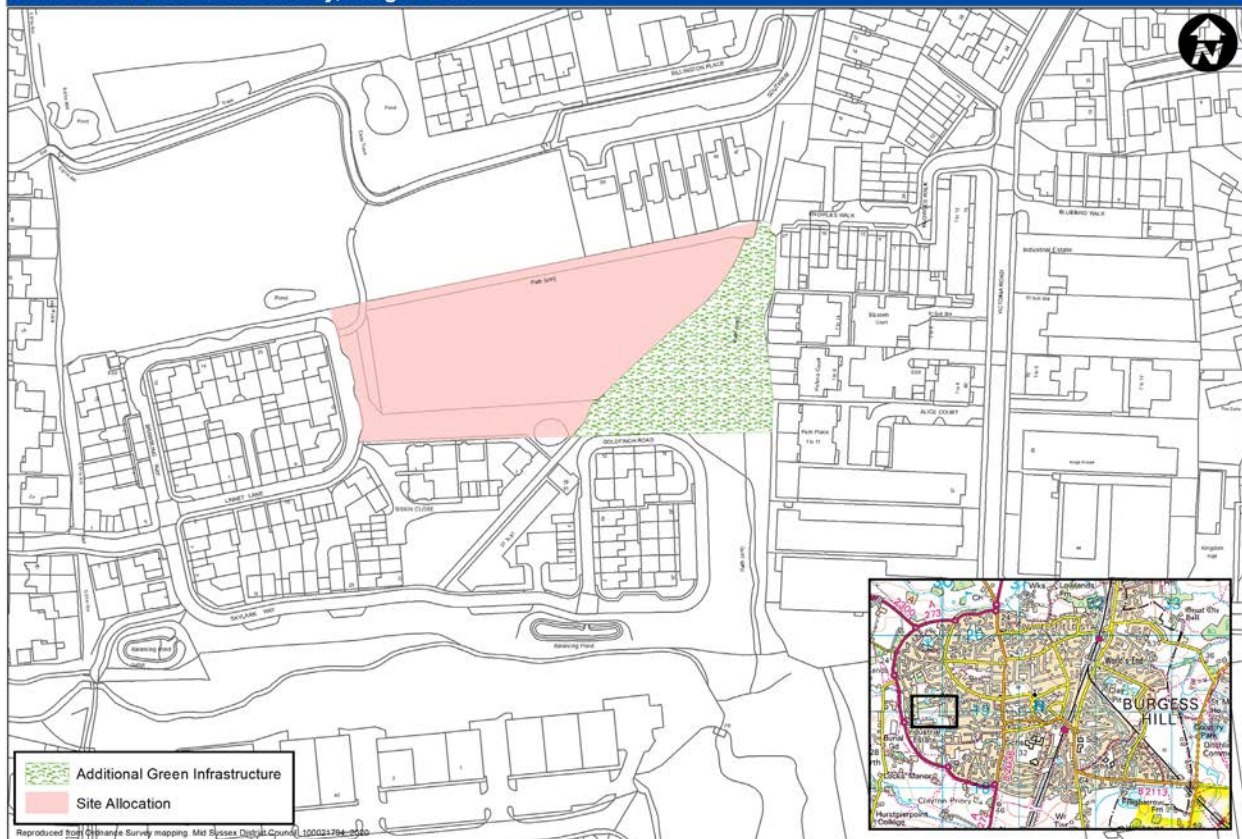
- The site is in a sustainable location near to services and Burgess Hill Town Centre. Optimise the development potential of the site while respecting the character of the surrounding townscape and residential amenity.
- Seek to enhance the connectivity of the site with the surrounding development by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

Landscape Considerations
<ul style="list-style-type: none"> • The south western corner of the site contains a number of trees covered by a group Tree Preservation Order. Retain and enhance existing mature trees and incorporate these into the landscaping proposals for the site.
Social and Community
<ul style="list-style-type: none"> • Include a community use as part of the development proposals as required by a restrictive covenant relating to this site.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> • Provide a net gain in biodiversity and Green Infrastructure through ecological enhancements, by incorporating new natural native habitats and native street trees into the landscaping proposals and designing buildings with integral bat boxes and bird nesting opportunities.
Highways and Access
<ul style="list-style-type: none"> • Provide access from Hammonds Ridge. • Provide a Sustainable Transport Strategy to identify sustainable transport infrastructure improvements and demonstrate how the development will provide comprehensive sustainable links to the town centre and transport hubs, including safe and convenient routes for walking and cycling.
Flood Risk and Drainage
<ul style="list-style-type: none"> • Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
Minerals
<ul style="list-style-type: none"> • The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 15 Land South of Southway, Burgess Hill

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

SA15: Land South of Southway, Burgess Hill



Objectives

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

Urban Design Principles

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

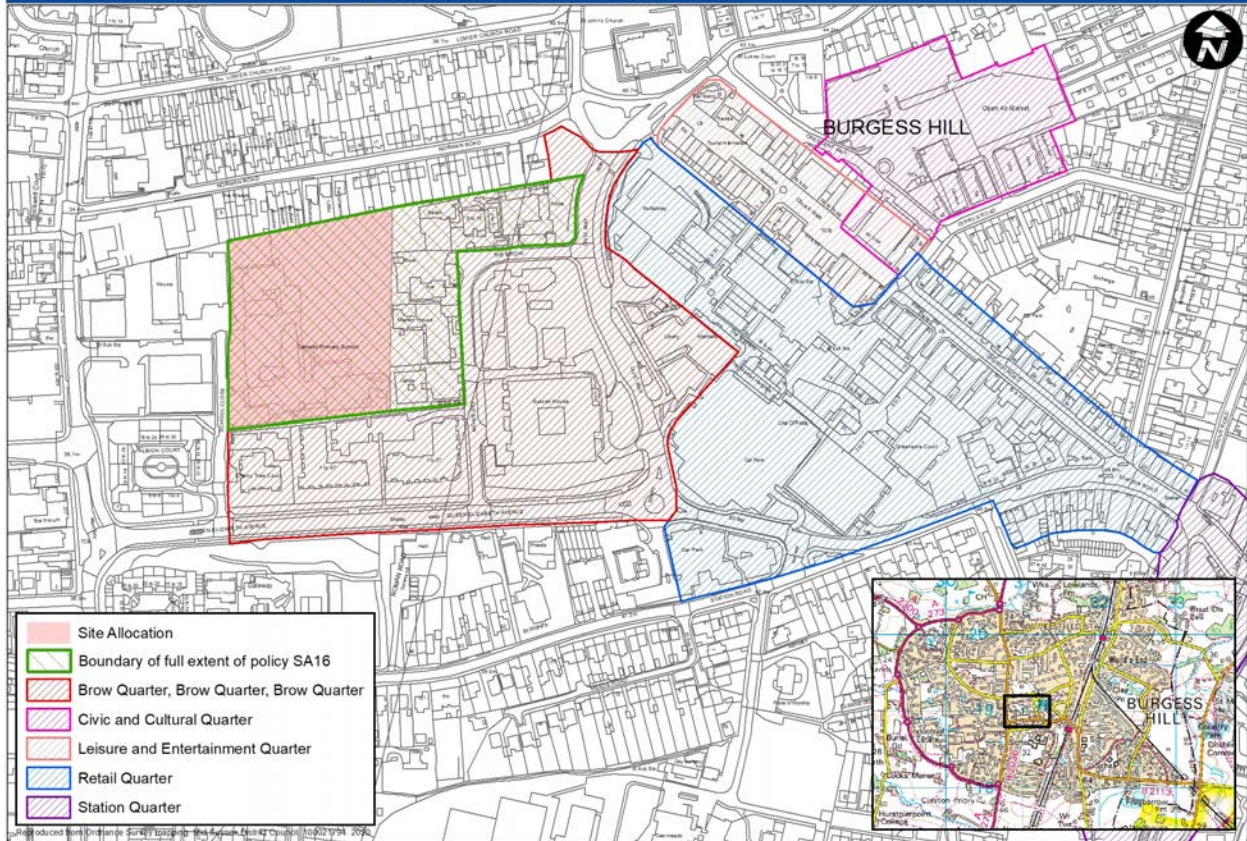
Landscape Considerations
<ul style="list-style-type: none"> • Retain any important mature trees and safeguard existing trees covered by Tree Preservation Orders, and incorporate these into the landscape structure of the development. • The layout of the development is to be informed by a landscape led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

SA 16

St. Wilfrids Catholic Primary School, School Close, Burgess Hill

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

SA16: St. Wilfrids Catholic Primary School, School Close, Burgess Hill



Objectives

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

Urban Design Principles

- Comprehensively masterplan development across the entire site, designing a fully integrated scheme which optimises the potential for the whole site as a single development, under the same planning application(s). Piecemeal development will be resisted.
- The anticipated yield of the comprehensive redevelopment scheme includes the 200 dwellings proposed in policy SA16, plus an additional 100 dwellings proposed in the Neighbourhood Plan for the Brow Quarter.
- Provide a coherent masterplan for the whole site involving integrated design, establishing a strong sense of place, focused around a high quality area of open space and carefully landscaped public realm, providing an appropriate setting for the scale of development, in accordance with The Brow Development Brief (SPD).

- Optimise the development potential of the site by providing high density development, up to 6 storeys in height designed as perimeter blocks that clearly defines public and private realms while also delivering a legible/permeable layout and active frontages.
- Deliver high quality public realm which maximises connectivity through the site, minimising the impact of parking and vehicle movement, providing attractive, convenient and safe pedestrian and cycle routes across the site, with links to existing networks outside the site.
- Parking should be discreetly accommodated and mostly provided off-street.
- Development shall respond appropriately to adjacent existing development in order to safeguard neighbouring amenity; particularly to the north of the site where a lower scale will be required to avoid overwhelming the rear gardens and domestic-scaled houses on Norman Road.
- Layout and design shall take account of potential development opportunities that exist immediately beyond the site boundaries to ensure future redevelopment opportunities are not hindered.

Social and Community

- Across the broader development area, which includes BHNP – TC3 The Brow Quarter, the existing uses include the following community uses; a General Practice (GP) Surgery/Clinic, Fire and Rescue Service Fire Station, Ambulance Station and Police Headquarters and St Wilfrid's Roman Catholic Primary School and playing fields.
- Redevelopment proposals shall provide evidence that demonstrates how replacement community facilities will be provided to the satisfaction of the Council and relevant key stakeholders, in accordance with the requirements of District Plan Policy DP25 (Community Facilities and Local Services); evidence shall include re-provision of the school playing fields or justification of their loss to the satisfaction of the Council and Sport England in accordance with the NPPF and Sport England's Playing Field Policy.

Historic Environment and Cultural Heritage

- Protect important views from within the site of the Grade II* Listed St John's Church to the north east, through careful design and layout.

Biodiversity and Green Infrastructure

- Provide a net gain in biodiversity, taking account of the wider ecological context, through biodiversity enhancements and Green Infrastructure provision, incorporating appropriate integral habitat in the construction of the buildings and inclusion of well designed and diverse landscaped areas with native street trees and planting.

Highways and Access

- Investigate access arrangements onto the Brow, including any necessary improvements to the highway infrastructure.
- Provide a Sustainable Transport Strategy to identify sustainable transport infrastructure improvements and demonstrate how the development will integrate with the existing network, providing comprehensive sustainable links to the town centre and transport hubs, including safe and convenient routes for walking and cycling.
- Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered.

Flood Risk and Drainage

- Design surface water drainage to minimise run off, incorporate SuDS and to ensure that Flood Risk is not increased.

Contaminated Land

- The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.

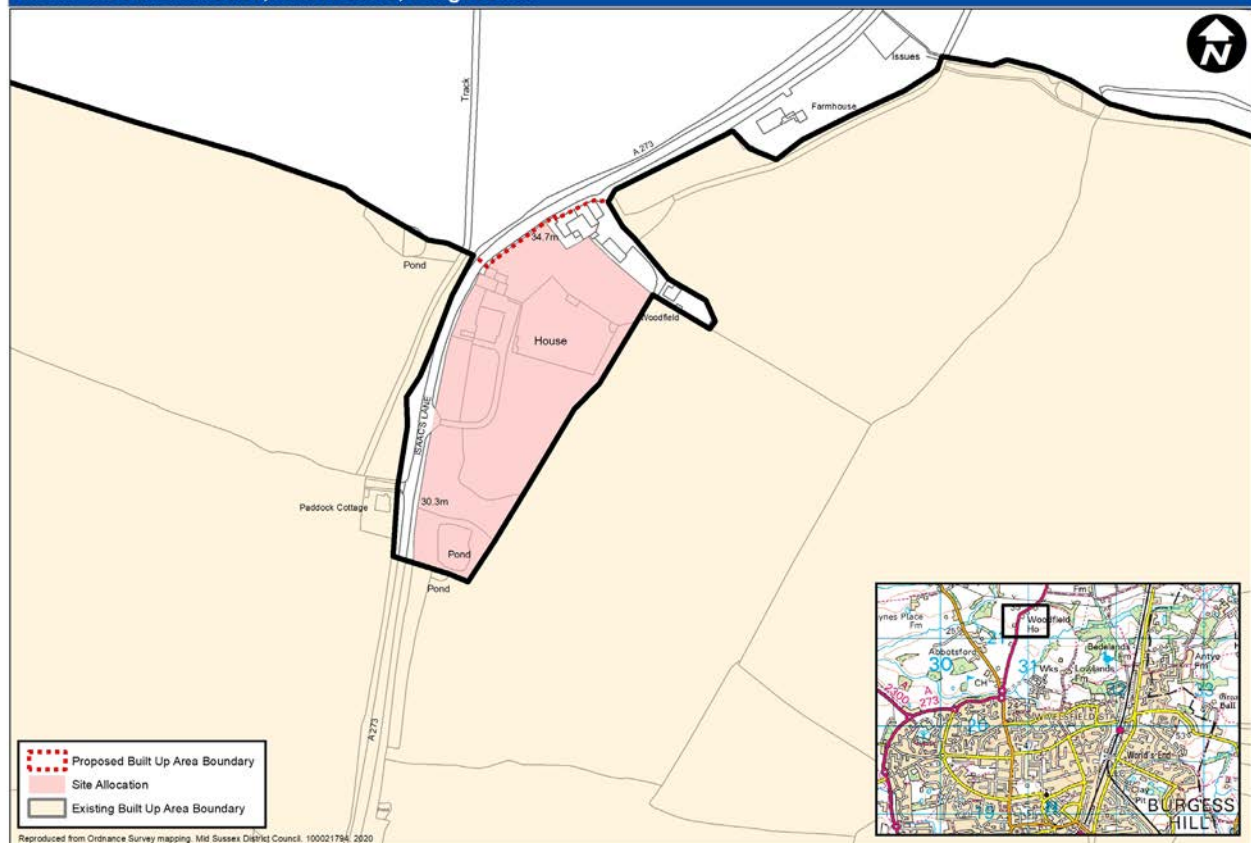
Utilities

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

SA 17 Woodfield House, Isaac's Lane, Burgess Hill

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

SA17: Woodfield House, Isaacs Lane, Burgess Hill



Objectives

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

Urban Design Principles

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

Landscape Considerations

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

- Identify and protect important views into and out of the site with proposals laid out so that views are retained and, where possible enhanced to improve both legibility and the setting of development.

Historic Environment and Cultural Heritage

- The site may contain buried archaeology. Carry out Archaeological Assessment and appropriate mitigation arising from the results.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area.
- Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure provision to improve biodiversity and water quality.

Highways and Access

- Integrated access with the Northern Arc Development is strongly preferred, the details of which will need to be investigated further.

Flood Risk and Drainage

- Provide a site specific Flood Risk Assessment (FRA) to consider how surface water will be disposed from the site.
- Incorporate Sustainable Drainage Systems as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.

Minerals

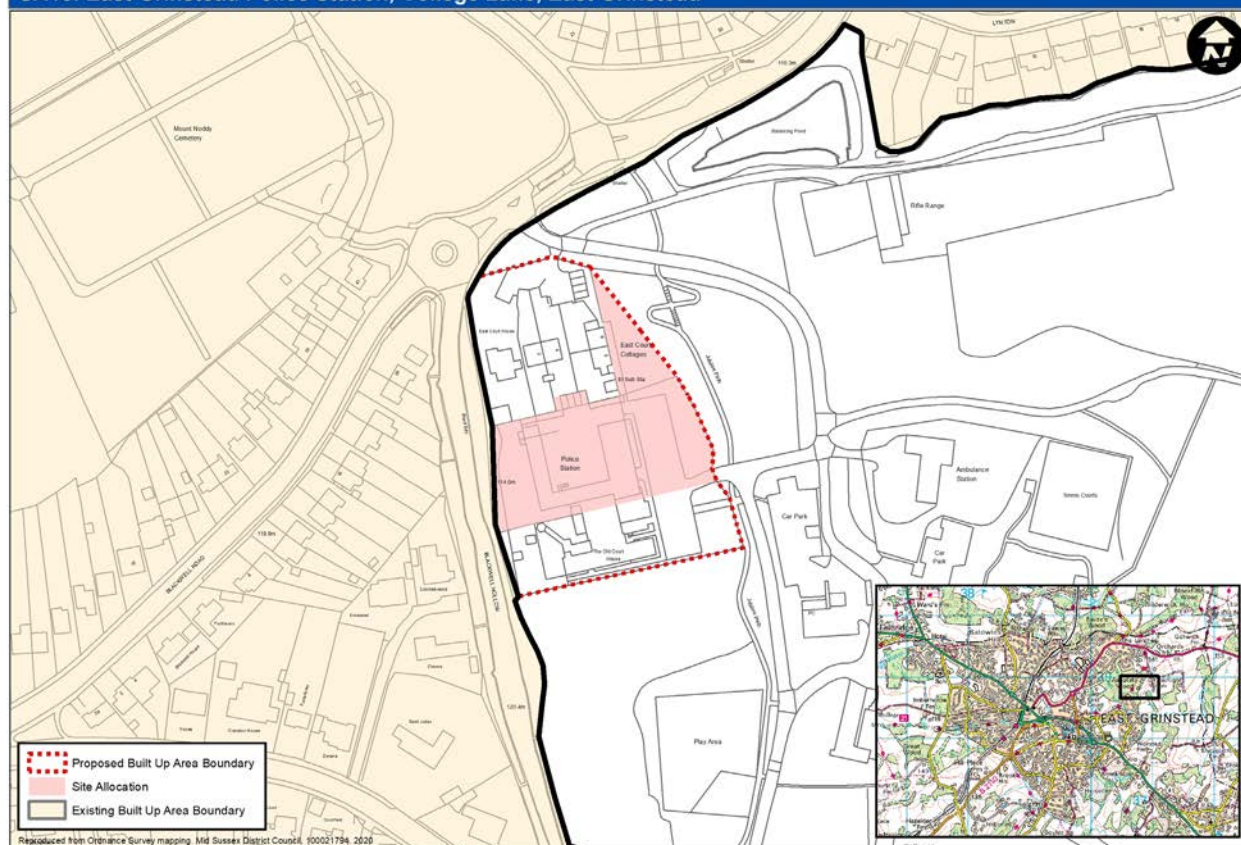
- The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 18

Former East Grinstead Police Station, College Lane, East Grinstead

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

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

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

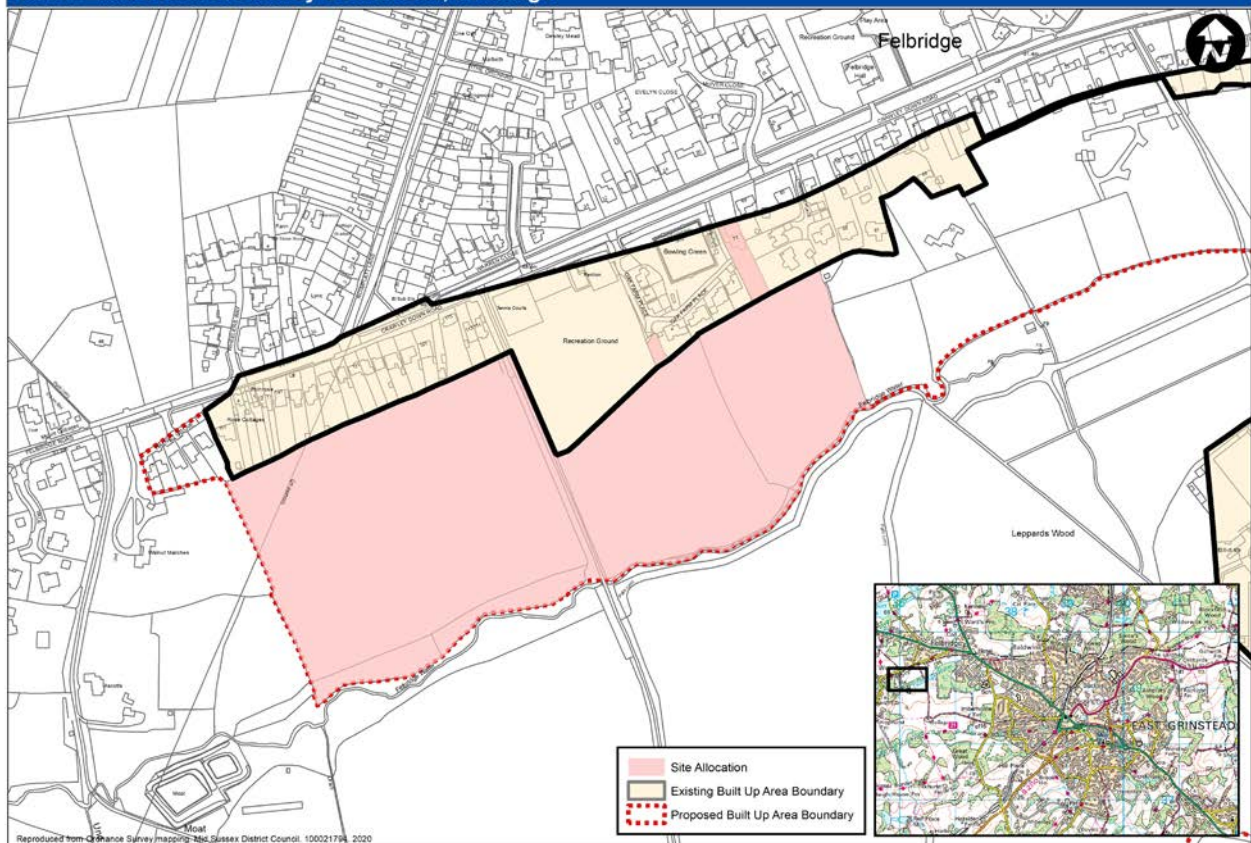
Historic Environment and Cultural Heritage
<ul style="list-style-type: none"> • Informed by a Heritage Impact Assessment, provide an appropriate design, layout and scale of development and landscaping scheme to protect the setting of the nearby Estcots and East Court Conservation Area and the Grade II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

SA 19

Land south of Crawley Down Road, Felbridge

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

SA19: Land south of Crawley Down Road, Felbridge



Objectives

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

Urban Design Principles

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

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside to the south.
- Retain and substantially enhance existing landscape structure, safeguarding existing mature and TPO trees and landscaping along/adjacent to the boundaries, and within the site and along historic field boundaries incorporating them into the landscape structure and layout of the development to contain the new housing, and limit the impact on the wider landscape; particularly to the southern boundary.
- Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.
- Development proposals shall protect and enhance the character and amenity of existing PRow which runs through the centre of the site leading to the Worth Way and provide connections through the new development.

Social and Community

- Provide a suitably managed and designed public open space, playspace and equipped children's playspace.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Provision of onsite SuDS will need to contribute to green infrastructure - the flood risk buffer along the Felbridge Water shall be used to maximise potential to enhance ecological connectivity, increase biodiversity and habitat creation.
- Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRow to the north, should be understood and adequately mitigated.
- Provision of good quality green space shall be made for people and wildlife to attract people away from the nearby Hedgecourt Lake SSSI.
- Provide necessary protection and mitigation, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package.
- Provide enhanced ecological corridors between the ancient woodland and wider landscape to ensure there is no ecological deterioration and fragmentation of the woodland.

Highways and Access

- Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing network providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
- Investigate access arrangements onto Crawley Down Road and make necessary safety improvements to secure appropriate visibility.
- The access shall include footpaths to either side to connect with the existing pedestrian network along Crawley Down Road.
- Working collaboratively with and to the satisfaction of both Surrey and West Sussex County Council Highway Authorities, mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered.
- Taking account for sustainable transport interventions, contribute towards providing any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site along the A22/A264 corridor.

- Contribute towards improvements and protect the quality of the existing PRow across the site and provide traffic calming measures where any vehicular access crosses the footpath.

Flood Risk and Drainage

- The Southern boundary of the site borders a watercourse (Felbridge Water) and its associated flood zones. Informed by a Flood Risk Assessment, a sequential approach shall be applied to ensure all development avoids the flood extent for the 1 in 100 year event including Climate Change allowances; hydraulic modelling is likely to be required to identify the full extent of the area.

Contaminated Land

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

Utilities

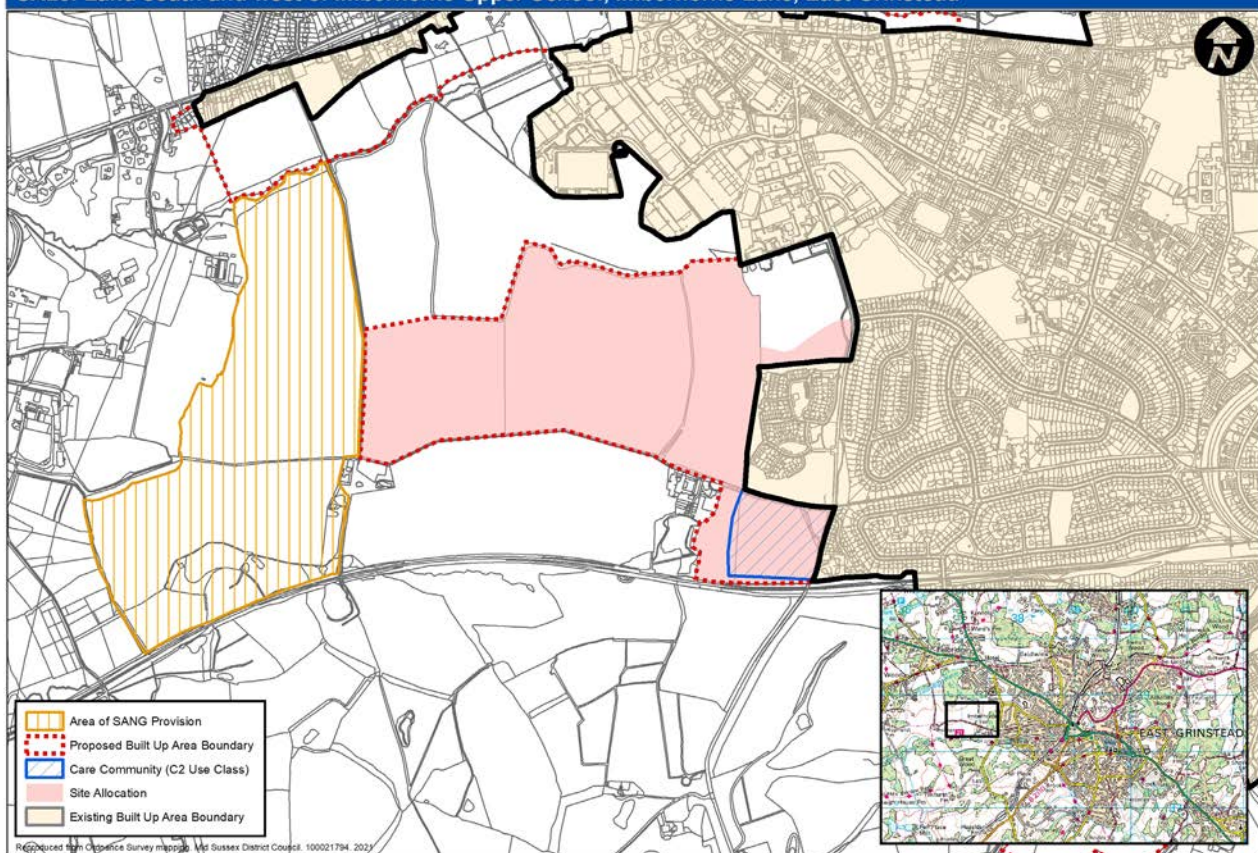
- Southern Water's Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 20

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

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

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



Objectives

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

Urban Design Principles

- Optimise the potential of the site through the masterplan process, whilst establishing a strong sense of place which is sympathetic to the existing local character of East Grinstead and the wider landscape setting.
- Development shall provide a pedestrian friendly neighbourhood centre that is centrally positioned and well integrated with the development and in close proximity to the main open space provision.

- Provide a positive and soft edge to Imberhorne Lane and the countryside with buildings that front on to the tree-lined field boundaries allowing an attractive backdrop to the public realm, avoiding trees overshadowing back gardens.
- Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use.
- Focus higher density development with 3 to 4 storey frontages in the most accessible part of the site around the neighbourhood centre. Carefully accommodate car parking to ensure it does not dominate the public realm.
- Ensure the site maximises connectivity with the existing settlement and services within East Grinstead and utilises a permeable layout throughout.

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on the wider countryside.
- Retain and substantially enhance existing landscape structure, safeguarding mature trees and landscaping along the boundaries, and within the site and along historic field boundaries incorporating them into the landscape structure and layout of the development to contain the new housing, and limit the impact on the wider landscape.
- Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.
- Development proposals shall protect and enhance the character and amenity of the existing PRoW which runs through the site and provide connections through the new development. Protect the character and amenity of the Worth Way which runs adjacent to the southern boundary.

Social and Community

- Provide a detailed phasing plan with agreement from the Local Planning Authority in consultation with key stakeholders to secure:
 - Land and financial contribution for early years and primary school (2FE) provision with Early Years pre-school and facilities for Special Educational Needs. – 2.2 ha
 - A land exchange agreement between WSCC and the developer to secure 6 ha (gross) land to create new playing field facilities in association with Imberhorne Secondary School (c.4 ha net - excluding land for provision of a new vehicular access onto Imberhorne Lane).
 - A community use agreement for the new playing fields/sports facilities at Imberhorne Upper School.
 - Provide a neighbourhood/local centre on site.
 - Provision of suitably designed and managed onsite strategic SANG – c.40 ha
 - Provision of onsite suitably managed equipped children’s playspace and public open space. In consultation with the Council, mitigate increased demand for formal sport.
 - Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.
 - In consultation with the Clinical Commissioning Group (CCG), address increase demand for GP services either on-site or by financial contribution to support expansion of existing local GP practices. Gypsies and Travellers and Travelling Showpeople provision may be required in accordance with District Plan policies DP30: Housing Mix and DP33: Gypsies and Travellers and Travelling Showpeople.

Historic Environment and Cultural Heritage

- Protect the rural setting of the nearby Grade II* listed Gullege, Grade II listed Imberhorne Farm and Grade II* listed Imberhorne Cottages by masterplanning the layout, design and landscape structure to ensure the development is not dominant in views from these listed buildings.
- Establish need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey, the results of which will identify appropriate archaeological mitigation.

- Undertake an holistic approach to Green Infrastructure and corridors, maintaining existing habitat connectivity, incorporating existing retained trees and hedgerows within the site and connect to surrounding landscape.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
- Provide necessary protection and mitigation, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package along with a substantial semi-natural buffer, in excess of the 15m minimum between development and areas of Ancient Woodland.
- Provide enhanced ecological corridors between the ancient woodland and wider landscape to ensure there is no ecological deterioration and fragmentation of the woodland.
- Provide appropriately managed strategic Suitable Alternative Natural Greenspace (SANG) to the satisfaction of the Local Planning Authority to attract people away from the nearby Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management.
- Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRow to the north and the Worth Way LWS to the south should be understood and adequately mitigated.

Highways and Access

- Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing sustainable transport network providing appropriate enhancements to the existing public transport networks and safe and convenient routes for walking and cycling to key destinations and links to the existing networks.
- Working collaboratively with and to the satisfaction of both Surrey and West Sussex County Council Highway Authorities mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered.
- Taking account for sustainable transport interventions, contribute towards providing any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site along the A22/A264 corridor.
- Vehicular access and necessary safety improvements will be provided on Imberhorne Lane; the access shall include footpaths to either side to connect with the existing pedestrian network along Imberhorne Lane.
- Contribute towards improvements to and positively integrate the PRow which cross the site, including providing an access link into the Worth Way cycle/pedestrian path (Three Bridges – East Grinstead).

Flood Risk and Drainage

- Provide a Flood Risk Assessment to identify the risk of flooding for different areas of the site. A sequential approach to the location of development should be followed and sufficient space retained to allow for the natural flood flow routes that cross the site, taking account of those which come from off site.
- Existing watercourses running across the site shall be given a minimum 5 metre buffer from the top of bank and any other existing water features shall be retained and enhanced.
- Retain and protect natural spring lines or flows along the southern part of the site adjacent to the Worth Way in order to avoid creating future flood risk.
- The masterplan process shall include measures to intergrate natural flood risk management techniques and infiltration SuDS into the layout and design of the development.

Contaminated Land

- Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required; particularly those associated with the historic landfill located around Imberhorne Farm to the south east of the site.

Minerals

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

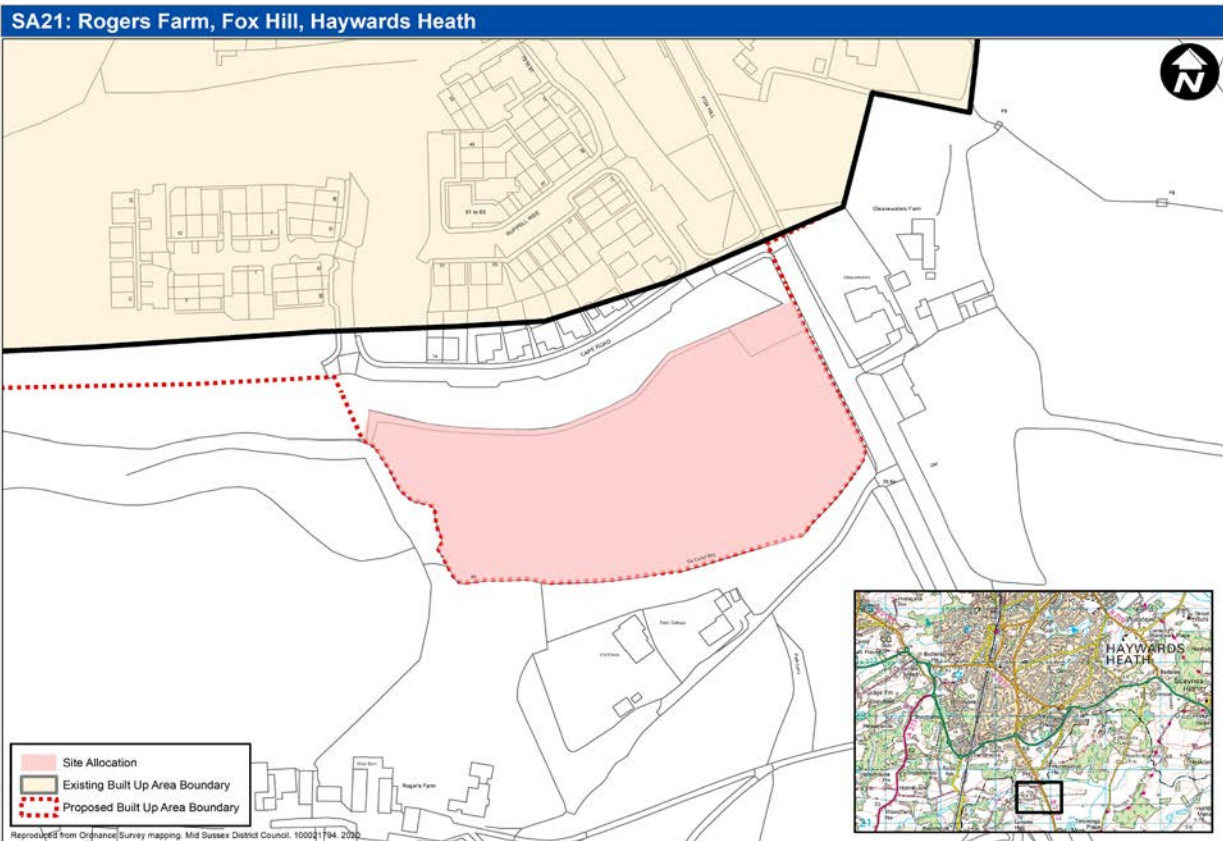
Utilities

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

SA 21

Rogers Farm, Fox Hill, Haywards Heath

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

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

- Protect the character and amenity of existing public footpaths that are adjacent to the southern and western boundaries of the site and provide connections to these from the new development.

Social and Community

- Create a well connected network of open spaces, suitable for informal recreation on the north and western part of the site. This area is unsuitable for development due to flood risk.

Historic Environment and Cultural Heritage

- Preserve the rural setting of the Grade II listed Cleavewater opposite the site through sensitive design and landscaping, including by creating a sufficiently sized landscape buffer along the frontage (eastern) boundary and by providing a locally native hedgerow and tree screen.
- Preserve the rural setting of the Grade II listed Rogers Farm and Old Cottage to the south and south west of the site by retaining and enhancing the tree belts along the southern and western boundaries.
- The mitigation strategy is to be informed by a Heritage Impact Assessment.
- The site may contain buried archaeology. Carry out Archaeological Assessment and appropriate mitigation arising from the results.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss to biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure provision to improve biodiversity and water quality.

Highways and Access

- Provide access to Lunces Hill (B2112), the details of which will need to be investigated further.
- Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.

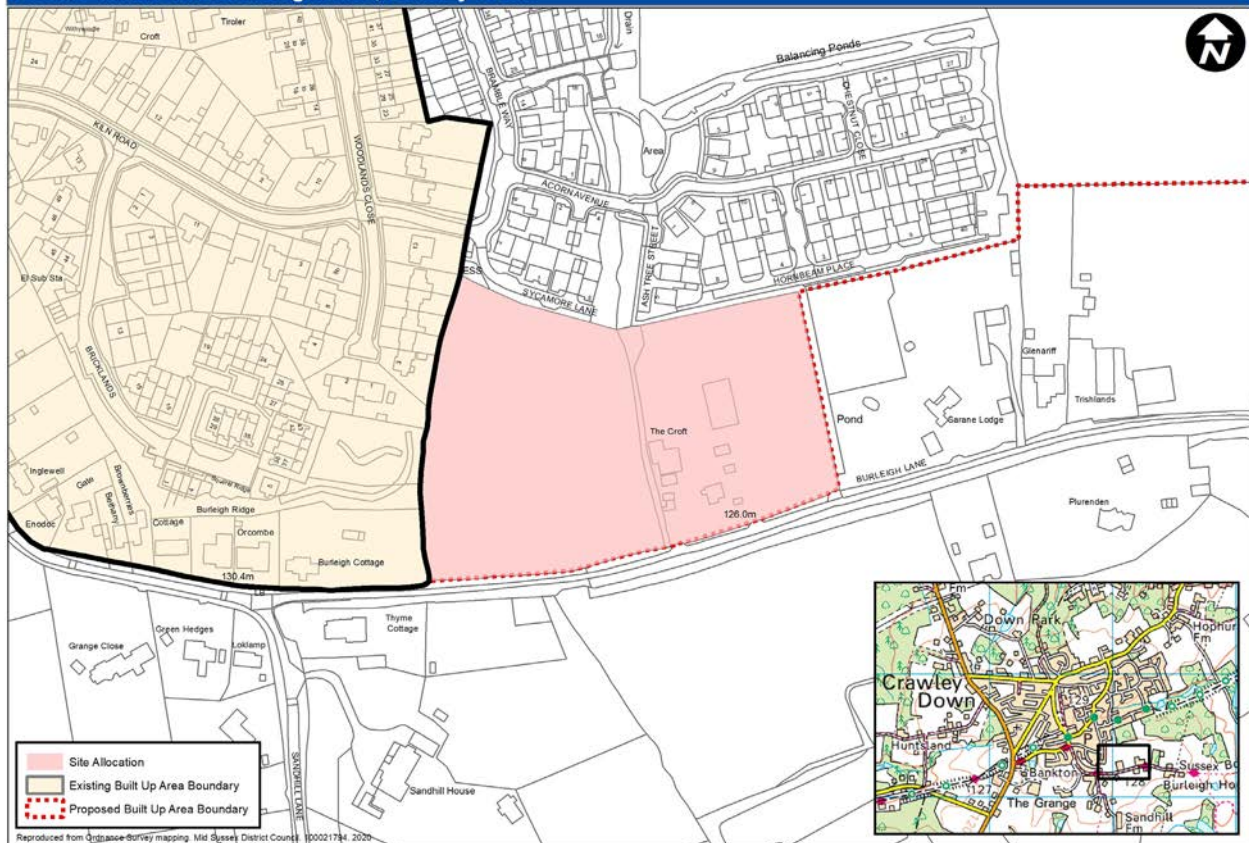
Flood Risk and Drainage

- The north western area of the site is at risk of surface water flooding due to the close proximity of watercourses and should not therefore be developed. Provide a Flood Risk Assessment (FRA) to inform the site layout and any necessary mitigation measures that may be required. Any existing surface water flow paths across the site must be maintained.
- Incorporate Sustainable Drainage Systems as an integral part of the Green Infrastructure and open space proposals to improve biodiversity and water quality.

SA 22 Land north of Burleigh Lane, Crawley Down

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

SA22: Land north of Burleigh Lane, Crawley Down



Objectives

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

Urban Design Principles

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

Landscape Considerations

- Retain and enhance existing mature trees and hedgerows on the site and around the boundaries and incorporate these into the landscaping structure for the site to limit impacts on the countryside. Open space should be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.

- Protect the rural character of Burleigh Lane and views from the south by minimising loss of trees and hedgerows along the southern boundary and reinforcing any gaps with locally native planting.
- Protect the character and amenity of existing public footpaths and seek to integrate these into the Green Infrastructure proposals for the site.

Social and Community

- Provide a Locally Equipped Accessible Play Space (LEAP) that is inclusive to the local community.

Historic Environment and Cultural Heritage

- Provide appropriate mitigation to protect the rural setting of the Grade II listed Burleigh Cottage adjacent to the west of the site by creating a sufficiently sized landscape buffer of open space between the listed building and the new development. Provide a hedgerow/ tree belt screening between the open space and the development to protect the rural setting of Burleigh Cottage. The mitigation strategy should be informed by a Heritage Impact Assessment.
- Protect the rural character of Burleigh Lane and the setting of Burleigh Cottage by retaining the stone gateways on Burleigh Lane along the southern boundary of the site.

Air Quality / Noise

- No site specific sensitivities identified.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity. Avoid any loss to biodiversity through ecological protection and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.

Highways and Access

- Provide access from Sycamore Lane.
- Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.

Flood Risk and Drainage

- Existing surface water flow paths cross the site and there is a watercourse adjacent to the east of the site. Provide a Flood Risk Assessment (FRA) to inform the site layout and any necessary mitigation measures that may be required.
- Design Surface Water Drainage to minimise run off to adjacent land, to incorporate SuDS and to ensure that Flood Risk is not increased.

Contaminated Land

- The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.

Utilities

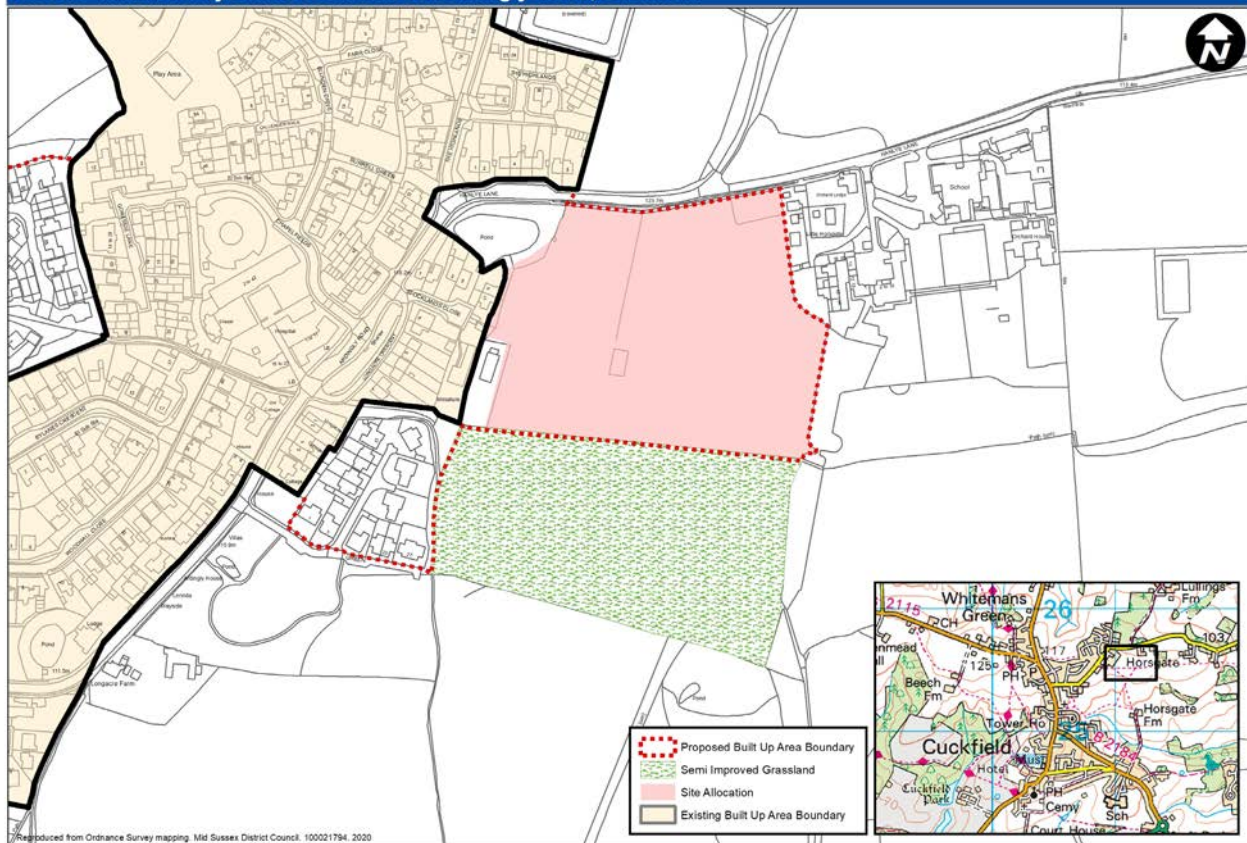
- Upgrade to the Sewerage infrastructure network is required. Occupation of development should be phased to align with the delivery of sewerage infrastructure in liaison with the service provider.

SA 23

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

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

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements in order to conserve and enhance the setting of the High Weald AONB adjacent to the north and minimise impacts on the wider countryside.
- Protect the rural character of Hanlye Lane and the approach to Cuckfield village by minimising the loss of the existing hedgerow and trees along the northern boundary.
- Sensitively design the layout to take account of the topography of the site, and views into and out of the site.
- The site contains a number of trees many with Tree Preservation Orders. Retain and enhance existing mature trees and hedgerows on the site, and on the boundaries, and incorporate these into the landscaping structure and Green Infrastructure proposals for the site in order to minimise impacts on the wider countryside. Open space should be provided as an integral part of this landscape structure.
- Protect the character and amenity of the existing public footpaths that cross the site and seek to integrate these with the Green Infrastructure proposals and the footpath to the north.

Social and Community

- Create a well connected area of open space on the land to the south, suitable for informal and formal recreation, that enhances and sensitively integrates the existing rights of way.

Historic Environment and Cultural Heritage

- The site is located near the crest of a sandstone ridge, in the High Weald a favourable location for archaeological sites. Carry out Archaeological assessment and appropriate mitigation arising from the results.

Biodiversity and Green Infrastructure

- The land to the south, as indicated on the Policies Map, is designated as a Semi Improved Grassland Priority Habitat. Manage this area to promote its conservation, restoration and enhancement in accordance with the Natural England management objectives for this type of habitat.
- Undertake a holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area.
- Conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
- Maintain a minimum buffer of 15 metres between the development and the north of Horsegate Wood ancient woodland.

Highways and Access

- Provide access from Hanlye Lane, the details of which need to be investigated.
- Investigate whether any highway measures are required to mitigate impacts at the intersection of London Road (B2036) and Ardingly Road (B2114).
- Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.

Flood Risk and Drainage

- The site is situated next to the village pond. The culverted pipe taking the outflow of the pond to the watercourse along the western boundary of the site to the southern field is in poor condition. Consider drainage works to improve the situation such as creating an open watercourse to avoid future blockage and capacity issues.
- Design surface water drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
- Incorporate Sustainable Drainage Systems in the southern part of the site as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.

Contaminated Land

- The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.

Minerals

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

Utilities

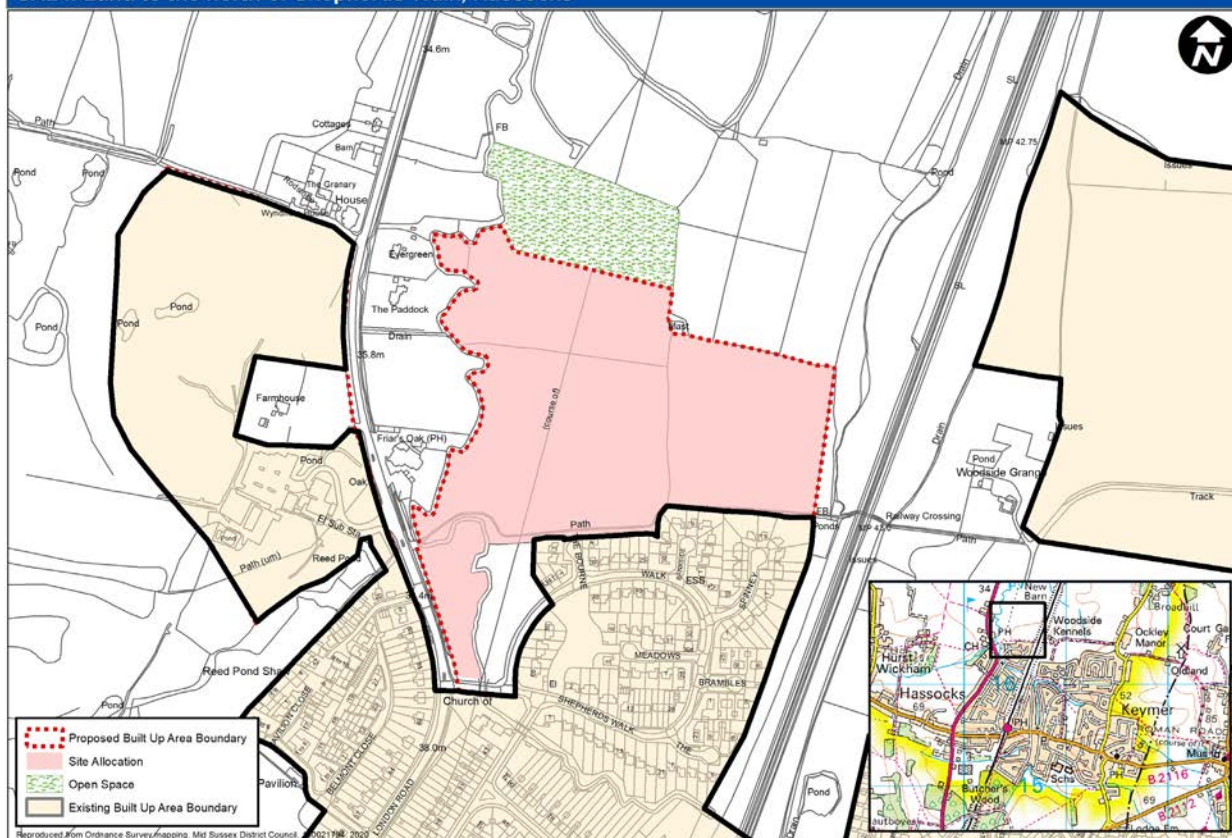
- Reinforcement of the sewerage network is required.
- Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

SA 24

Land to the north of Shepherds Walk, Hassocks

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

SA24: Land to the north of Shepherds Walk, Hassocks



Objectives

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

Urban Design Principles

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

Landscape Considerations

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on the wider countryside.

- There are a number of trees covered by Tree Preservation Orders on the site. Existing hedgerows, mature and protected trees along the boundaries and within the site shall be retained, enhanced incorporating landscape buffers and incorporated into the landscape structure and layout of the development.
- Development proposals will need to protect the amenity and character of the existing public footpath which runs across the southern portion of the site, including where any diversion is necessary, providing new connections from the development where appropriate.

Social and Community

- Provide an extension to Shepherds Walk open space to include an equipped children's playspace. The land is to be transferred to MSDC with an agreed commuted sum to cover future management.
- Ensure safe inclusive access across the railway line on the east boundary of the site through the provision of either a tunnel or footbridge.

Historic Environment and Cultural Heritage

- Pre-determination evaluation and appropriate mitigation may be required.
- Archaeological field evaluation (geophysical survey) shall be undertaken to inform an archaeological mitigation strategy.

Air Quality / Noise

- An Air Quality Impact Assessment is required in accordance with up to date local guidance to assess the potential impacts on the Stonepound Crossroads Air Quality Management Area (AQMA) and shall identify practical mitigation where appropriate.
- A noise assessment will be required to inform mitigation measures to reduce the impact of noise from the adjacent railway line.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements and protection of the flood plain area adjacent to Herrings Stream which runs along the western boundary of the site as a Green Infrastructure corridor.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure - provide a wildlife buffer and appropriate enhancements to Herrings Stream to improve biodiversity and habitat creation.

Highways and Access

- Provide a sustainable transport strategy identifying sustainable transport infrastructure improvements and demonstrating how the development will integrate with the existing network and provide safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.
- Investigate access arrangements onto London Road and make necessary safety improvements.
- Access shall include footpaths to connect with the existing pedestrian network along London Road and improved pedestrian links to the existing Friar's Oak bus stop.
- Contribute towards improvements of Public Rights of Way (PRoW) across and in the vicinity of the site, including provision of safe access over the railway line on the east boundary of the site.

Flood Risk and Drainage

- The western boundary of the site borders a designated Main River (Herrings Stream) and its associated flood zones. Informed by a Flood Risk Assessment which identifies the flood extent, a sequential approach shall be applied to ensure development avoids the flood extent and shall include additional buffer zones for the 1 in 100 year event and include Climate Change allowances.
- Access to the site is across the flood plain and shall be appropriately designed to ensure that flood risk is not increased and any necessary flood plain compensation is provided.
- Safeguard Herrings Stream as part of any redevelopment and secure the long term protection and maintenance of the watercourse and landscape around it.
- Surface Water Drainage shall be designed to incorporate SuDS and minimise run off from the site to ensure that Flood Risk is not increased.

Minerals

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

Utilities

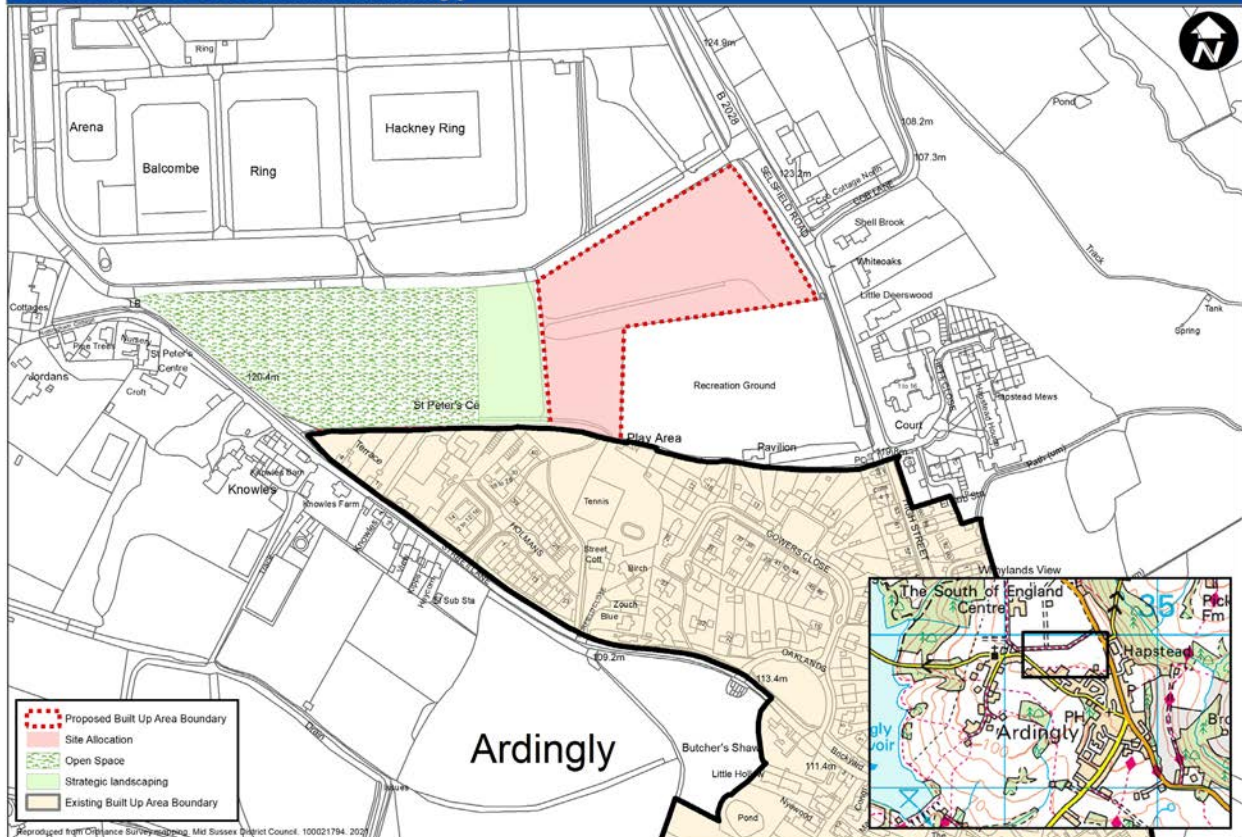
- Southern Water's Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 25

Land west of Selsfield Road, Ardingly

SHELAA:	832	Settlement:	Ardingly
Gross Site Area (ha):	5.17	Number of Units:	35 dwellings
Description:	Housing allocation with on site public open space.		
Ownership:	Private land owner		
Current Use:	Greenfield/parking for showground	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.		

SA25: Land west of Selsfield Road, Ardingly



Objectives

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

Urban Design Principles

- Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end.
- Respect the distinctive character of the village and the existing settlement pattern.
- Orientate development to positively address existing and proposed areas of open space.
- Orientate development to have a positive edge to all site boundaries and to the adjacent recreation ground, facilitated by and including the removal of the existing bund providing a focal point for the development where sensitively designed higher density housing could be located; close boarded fencing should be avoided where visible from outside the site.
- Provide a permeable layout and enhance the connectivity of the site with Ardingly village and existing PRoW.

AONB

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape of the High Weald AONB, as set out in the High Weald AONB Management Plan.
- Retain and substantially enhance existing trees and hedgerows incorporating them into the landscape structure and layout of the development and reinstate the historic field boundary through the centre of the site adjacent to the area of open space to the west, with native species-rich hedgerow and native trees, incorporating the existing mature Oak tree.
- Incorporate retained landscape features into a strong new landscape setting, containing the new housing and limiting the impact on the wider landscape.
- Protect and enhance the character and amenity of existing PRow which runs along the northern and southern boundaries and provide connections from the new development.

Social and Community

- In consultation with the Local Planning Authority, address requirements for suitably managed open space and equipped children's playspace, either on-site or by financial contribution to upgrade existing adjacent facilities.

Historic Environment and Cultural Heritage

- Provide appropriate design, layout and landscaping mitigation to protect the rural setting of the adjacent Ardingly Conservation Areas and nearby listed St Peter's Church (Grade I) and the listed group which surrounds the Church (Grade II); ensure development is not dominant in views from within the conservation areas and the setting of the listed buildings.
- Retain the western end of the site as an undeveloped area of public open space in order to protect the rural setting of these assets and maintain separation of the two historic cores of the village.
- Establish the need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey shall be undertaken, the results of which will identify appropriate archaeological mitigation.

Air Quality / Noise

- Noise assessment shall inform any necessary mitigation required to provide an acceptable standard of accommodation for each of the dwellings, arising from the Ardingly Showground operations.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.

Highways and Access

- Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the existing network providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks in Ardingly.
- Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered.
- Investigate access arrangements onto Selsfield Road and make necessary safety improvements.

Flood Risk and Drainage

- Provide a Flood Risk Assessment which includes details of ground investigations and permeability testing to inform an appropriate method for disposal of surface water and explores the potential use of infiltration SuDS.

Contaminated Land

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

Minerals

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

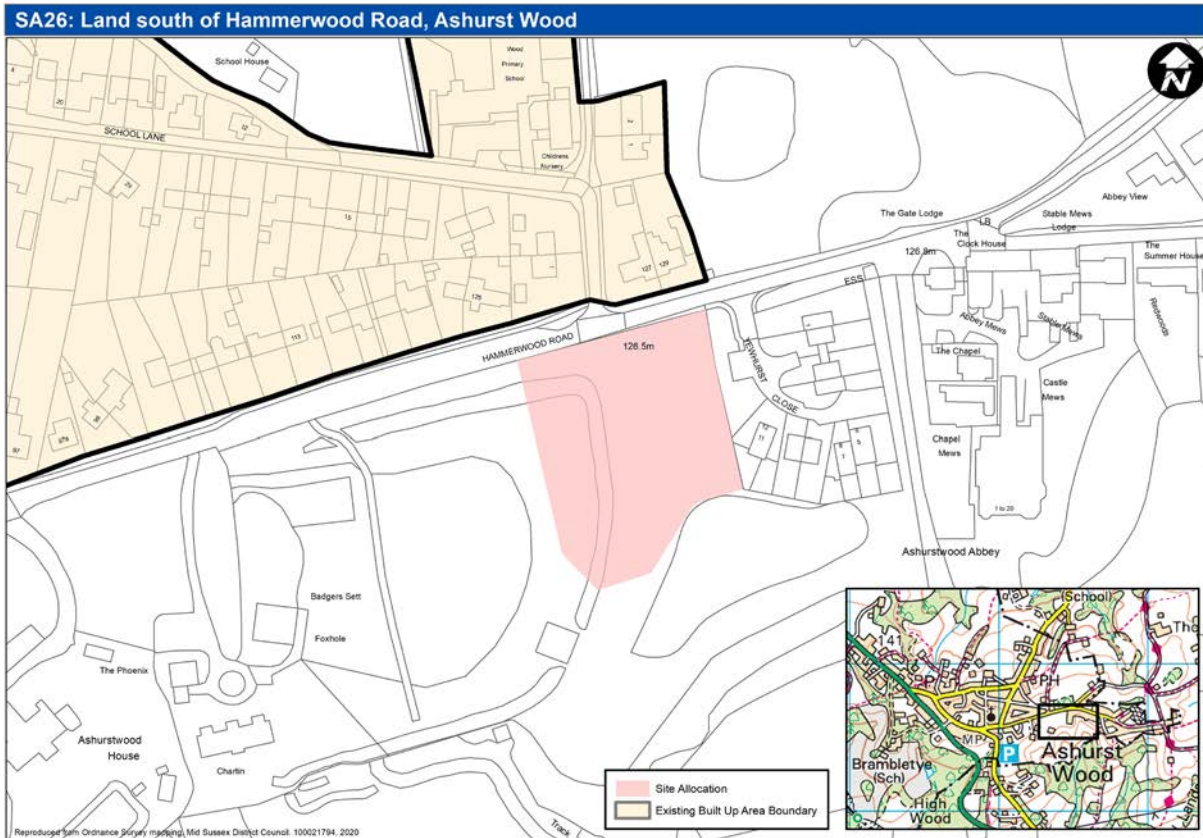
Utilities

- Occupation of development will be phased to align with the delivery of necessary sewerage infrastructure, in liaison with the service provider.
- Southern Water's Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

SA 26

Land south of Hammerwood Road, Ashurst Wood

SHELAA:	138	Settlement:	Ashurst Wood
Gross Site Area (ha):	0.58	Number of Units:	12 dwellings
Description:	Housing allocation		
Ownership:	Private land owner(s)		
Current Use:	Workshop, woodland and grassland.	Indicative Phasing:	6 to 10
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development		



Objectives

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

Urban Design Principles

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

AONB

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

Biodiversity and Green Infrastructure

- Impact on the nearby Herries Pasture a Local Wildlife Site (LWS) and on-site wildlife habitat shall be fully considered and appropriate mitigation measures specified.
- Restore and manage the areas of designated Deciduous Woodland Priority Habitat, introducing new parkland style mixed native planting and enhancing green corridors to the surrounding landscape and conserve and enhance habitats for native species.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.

Highways and Access

- Investigate the most suitable vehicular access arrangements from either Yewhurst Close or Hammerwood Road, taking account of landscape impacts and make necessary safety improvements and contributions towards sustainable transport infrastructure improvements.

Flood Risk and Drainage

- Following any necessary remediation of previously contaminated land, Surface Water Drainage shall be designed to incorporate SuDS and minimise run-off, to ensure Flood Risk is not increased elsewhere.
- Incorporate SuDS as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.

Contaminated Land

- The land may be contaminated due to present or historical on site or adjacent land uses and is positioned over a secondary aquifer. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required to ensure there is no risk to human health and/or groundwater supplies.

Minerals

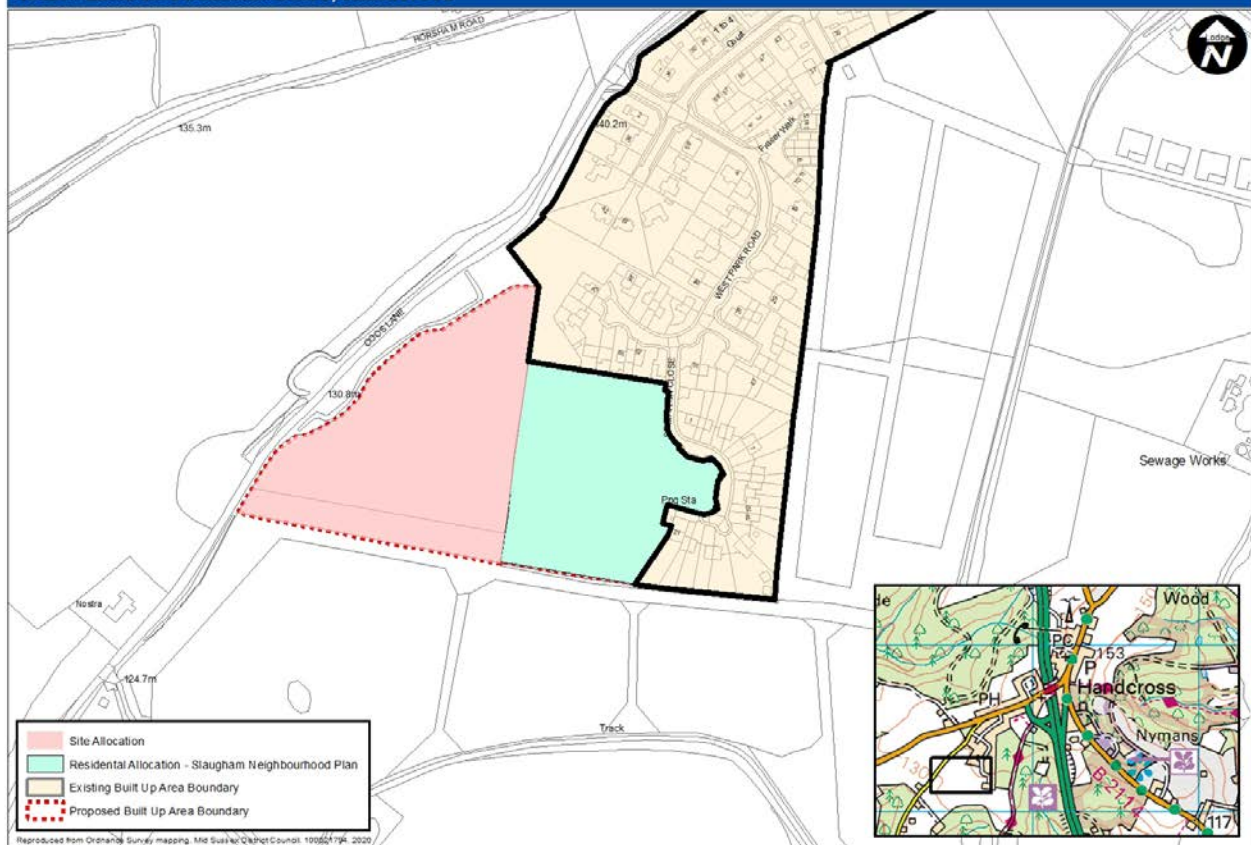
- The site lies within the brick clay (Wadhurst clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

SA 27

Land at St. Martin Close, Handcross

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

SA27: Land at St. Martin Close, Handcross



Objectives

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

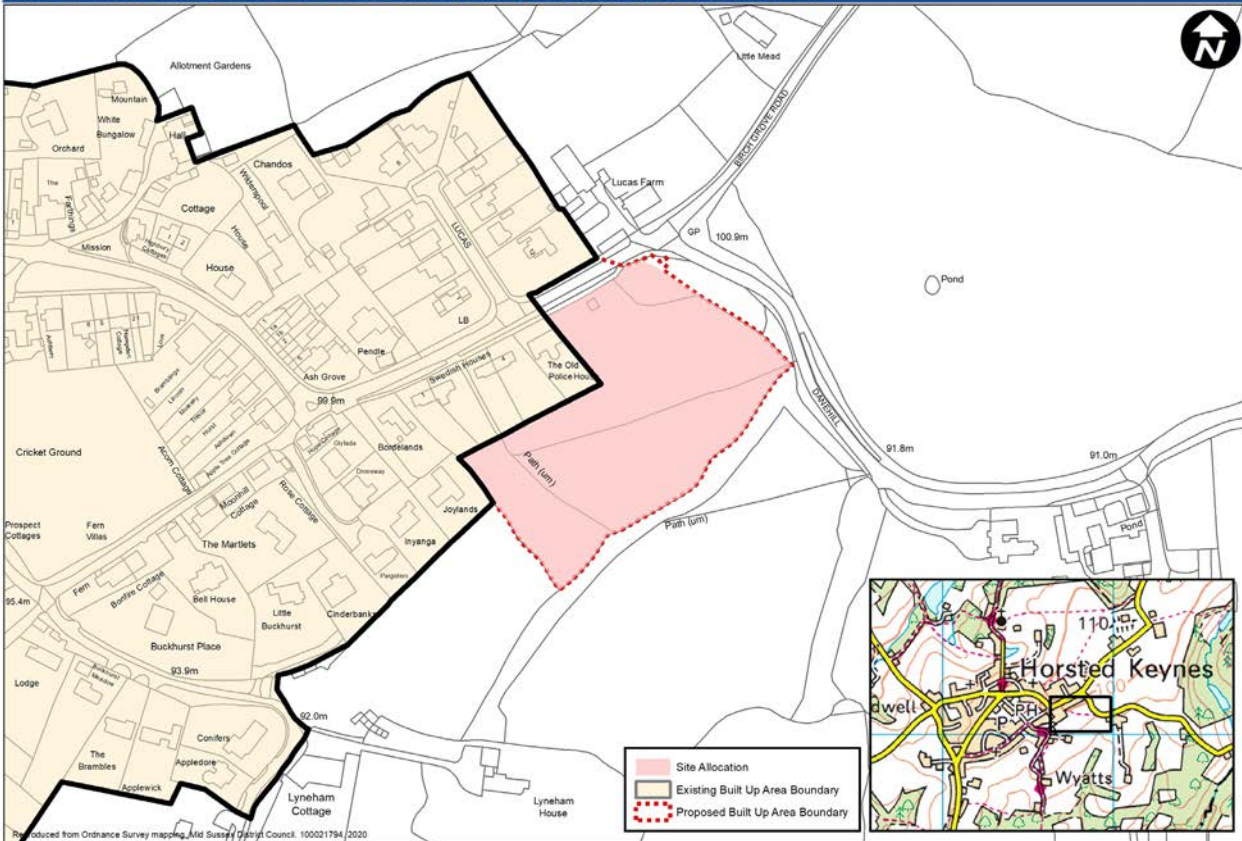
<p>Urban Design Principles</p> <ul style="list-style-type: none"> • Provide a landscape led, coherent master-plan that involves integrated design, landscaping, access and open space arrangements with that of St Martin Close (East). • Contribute towards local character and local needs of Handcross village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

SA 28

Land South of The Old Police House, Birchgrove Road, Horsted Keynes

SHELAA:	807	Settlement:	Horsted Keynes
Gross Site Area (ha):	1.23	Number of Units:	25 dwellings
Description:	Housing allocations		
Ownership:	Private landowner		
Current Use:	Greenfield/pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	Private landowner in partnership with Developer		

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



Objectives

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

Urban Design Principles

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

AONB

- Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA) in order to conserve and enhance the landscape of the High Weald AONB, as set out in the High Weald AONB Management Plan.
- Identify and protect important views into and out of the site with proposals laid out so that views are retained and, where possible, enhanced to improve both legibility and the setting of development.
- Protect the rural character of Birchgrove Road and this edge of settlement by retaining, where possible, the Oak tree and hedgerow on the frontage of the site.
- Retain important mature trees and hedgerows along the eastern, southern and western boundaries of the site, and incorporate these into the landscape structure and Green Infrastructure proposals of the development to limit impacts on the wider countryside. Open space should be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.
- Protect the character and amenity of the existing public footpath (a historic routeway) that crosses the site and seek to integrate this with the Green Infrastructure proposals for the site.

Historic Environment and Cultural Heritage

- Provide appropriate mitigation to protect the rural setting and historic farmstead of the Grade II listed Lucas Farm to the north of the site by creating a sufficiently sized landscape buffer at the north eastern corner of the site and by retaining and enhancing the tree belt on the eastern boundary. The mitigation strategy should be informed by a Heritage Impact Assessment.
- Conserve the setting of the Horsted Keynes Conservation Area by ensuring that development is not dominant in views through appropriate design and landscaping. The mitigation strategy should be informed by a Heritage Impact Assessment.
- The site is located near the crest of a sandstone ridge in the High Weald, a favourable location for archaeological sites, requiring Archaeological Assessment and appropriate mitigation arising from the results.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site that connect to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.

Highways and Access

- Provide access from Birchgrove Road, ensuring sufficient visibility splays are provided with the junction with Danehill Lane.
- Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.

Flood Risk and Drainage

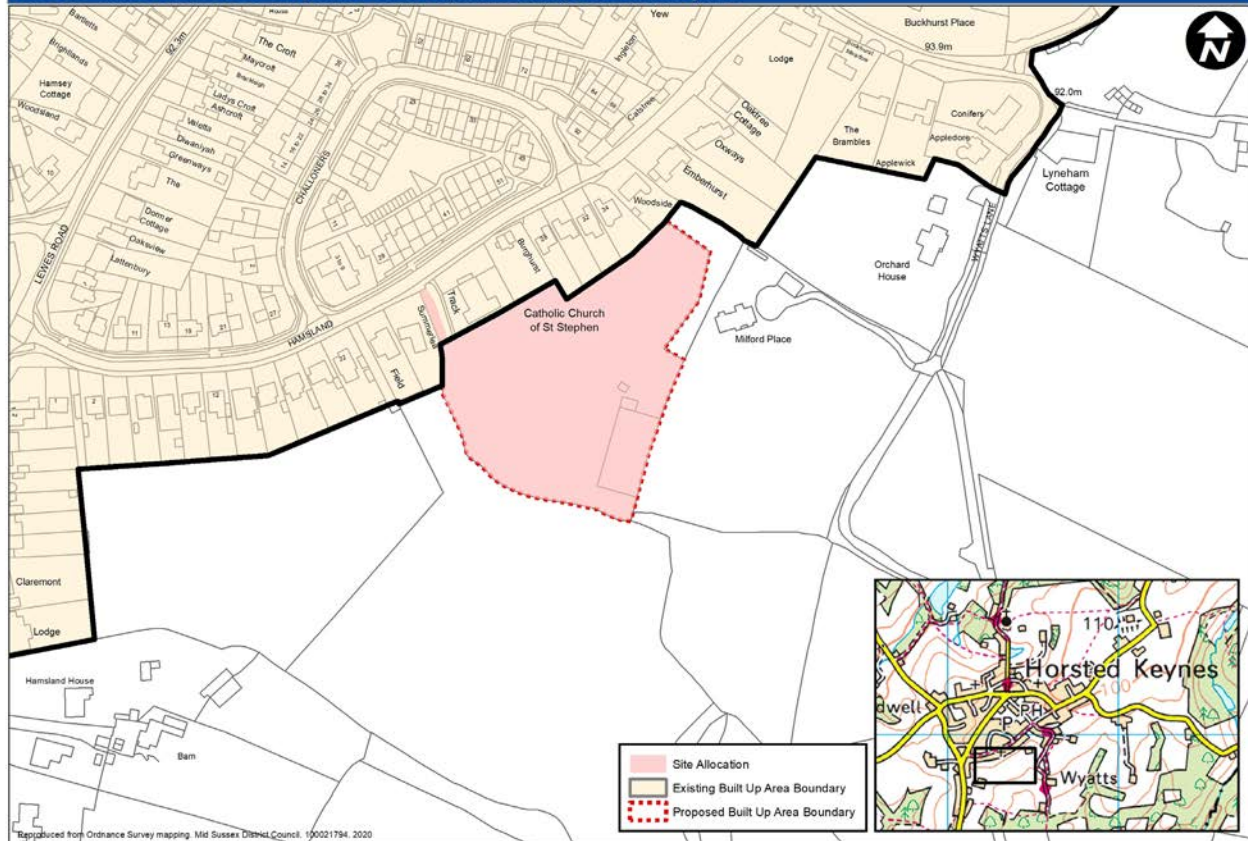
- The site lies within a Groundwater Source Protection Zone 3. Development proposals will need to demonstrate that there is no significant harm caused to groundwater resources.
- Manage surface water to minimise flood risk and flows to watercourses and incorporate SuDS as an integral part Green Infrastructure provision to improve biodiversity and water quality. The design and layout of the SuDS will need to be informed by ground investigation and permeability testing, and take into account the location of the site within a Groundwater Source Protection Zone.

SA 29

Land south of St. Stephens Church, Hamsland, Horsted Keynes

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

SA29: Land south of St. Stephens Church, Hamsland, Horsted Keynes



Objectives

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

Urban Design Principles

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

AONB

- Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA) in order to conserve and enhance the landscape of the High Weald AONB, as set out in the High Weald AONB Management Plan.
- Identify and protect important views into and out of the site with proposals laid out so that views are retained and, where possible enhanced to both improve legibility and the setting of development.
- Retain and enhance important landscape features, mature trees and hedgerows and incorporate these into the landscape structure and Green Infrastructure proposals for the development to limit impacts on the wider countryside. Open space is to be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.

Historic Environment and Cultural Heritage

- Provide appropriate mitigation to protect the rural setting of the Grade II listed Wyatts to the south of the site by enhancing the boundary tree belt at the south western corner, and ensuring that development is not dominant in views from the listed building. The mitigation strategy is to be informed by a Heritage Impact Assessment.
- The site is located near the crest of a sandstone ridge in the High Weald, a favourable location for archaeological sites, requiring Archaeological Assessment and appropriate mitigation arising from the results.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure provision through biodiversity and landscape enhancements within the site connecting to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.
- Ensure adequate protection of the existing trees along the site boundary.

Highways and Access

- Safe and convenient pedestrian and vehicular access needs to be secured, in accordance with Manual for Streets (MfS) to enable (a) satisfactory access by waste collection vehicles and emergency services vehicles; and (b) safe and convenient pedestrian access, both along Hamsland and into the proposed development.
- Investigate opportunities to set the access away from the trees on the site boundary to protect the existing trees.
- Improve local traffic conditions by setting back the existing on-street parking spaces in Hamsland into the verge opposite the site.
- Provide a sustainable transport strategy to identify sustainable transport infrastructure improvements and how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.

Flood Risk and Drainage

- Design Surface Water Drainage to minimise run off, to incorporate SuDS and to ensure that Flood Risk is not increased.
- Provide SuDs in the southern part of the site as an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.

Contaminated Land

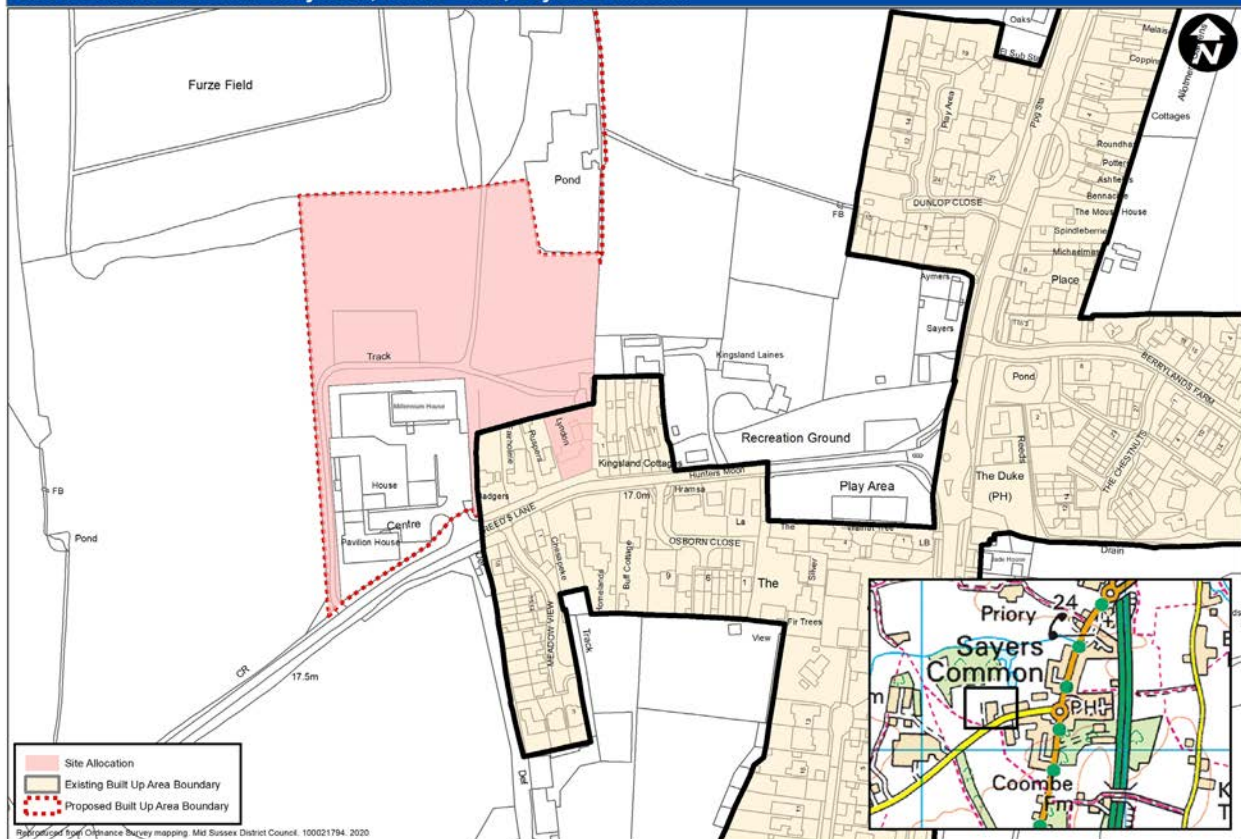
- The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of on-site contamination together with any remedial works that are required.

SA 30

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

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

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

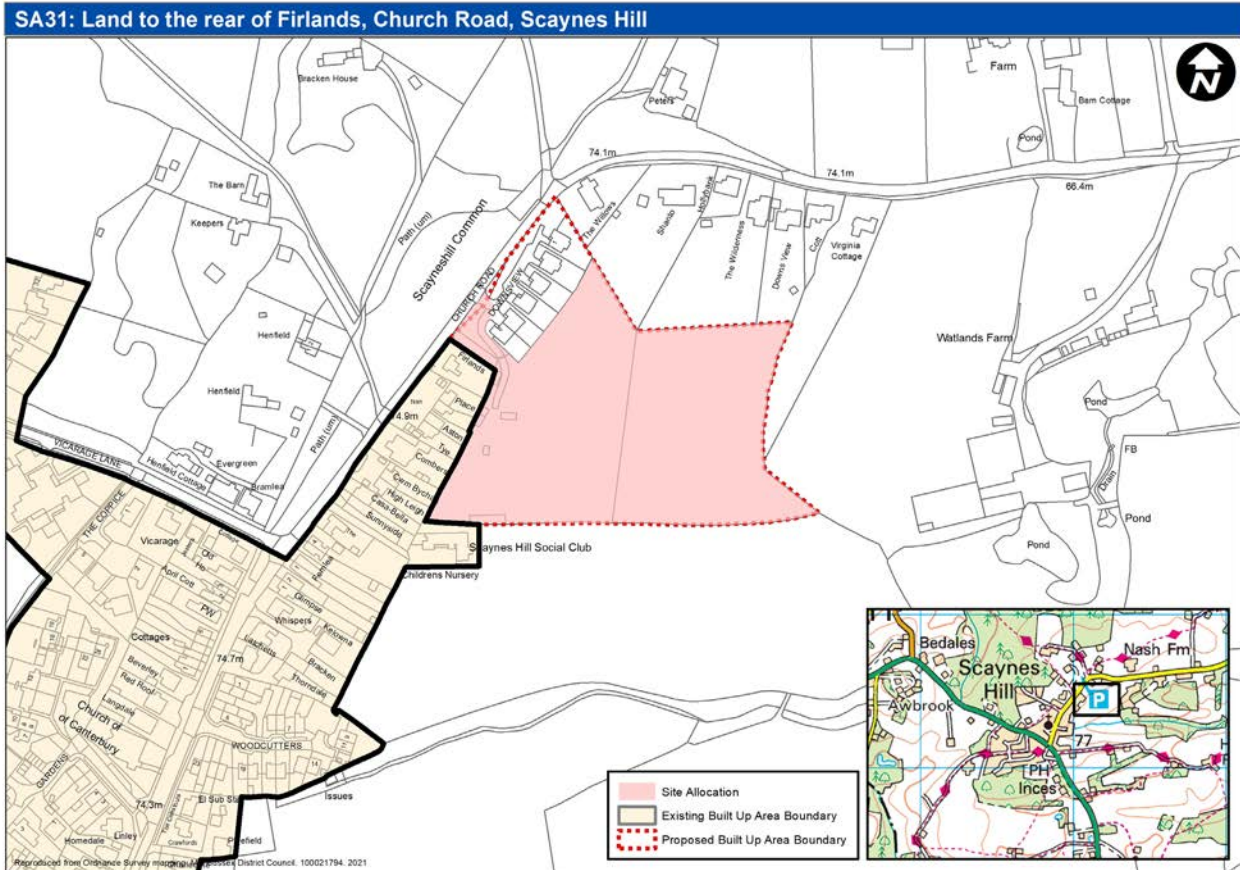
- Retain and enhance existing mature trees and hedgerows on the site and on the boundaries, and incorporate these into the landscaping structure and Green Infrastructure proposals for the site to limit impacts on the wider countryside.
- Open space is to be provided as an integral part of this landscape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

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

SA 31

Land to the rear Firlands, Church Road, Scaynes Hill

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

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

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements within the site connecting to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.
- Retain and enhance existing hedgerows retaining a minimum of a 5 metre buffer to development and provide new native tree planting and species-rich hedgerows to provide a green corridor network.
- Exploit the undeveloped south-eastern area of the site for landscape and ecological enhancements and public open space.
- Undertake an assessment of any impacts on Scaynes Hill Common Local Wildlife Site (LWS) and Costells, Henfield and Nashgill Woods LWS shall be made and appropriately mitigated against. Unavoidable damage to biodiversity must be off-set through ecological enhancement and mitigation measures to ensure there is a net gain in biodiversity.

Highways and Access

- Investigate access arrangements onto Church Road and make necessary safety improvements and provide safe and convenient routes for walking and cycling through the site and contribute towards sustainable transport infrastructure.
- Contribute towards provision of a footpath connecting the site to the existing footpath to the south. This could be done either as an extension to the Scaynes Hill Common footpath or exploring options for a formal footway alongside the carriageway.

Flood Risk and Drainage

- Informed by permeability testing, design surface water drainage to minimise run off and incorporate SuDS to ensure that Flood Risk is not increased.
- Any SuDS shall be an integral part of the Green Infrastructure proposals to improve biodiversity and water quality.

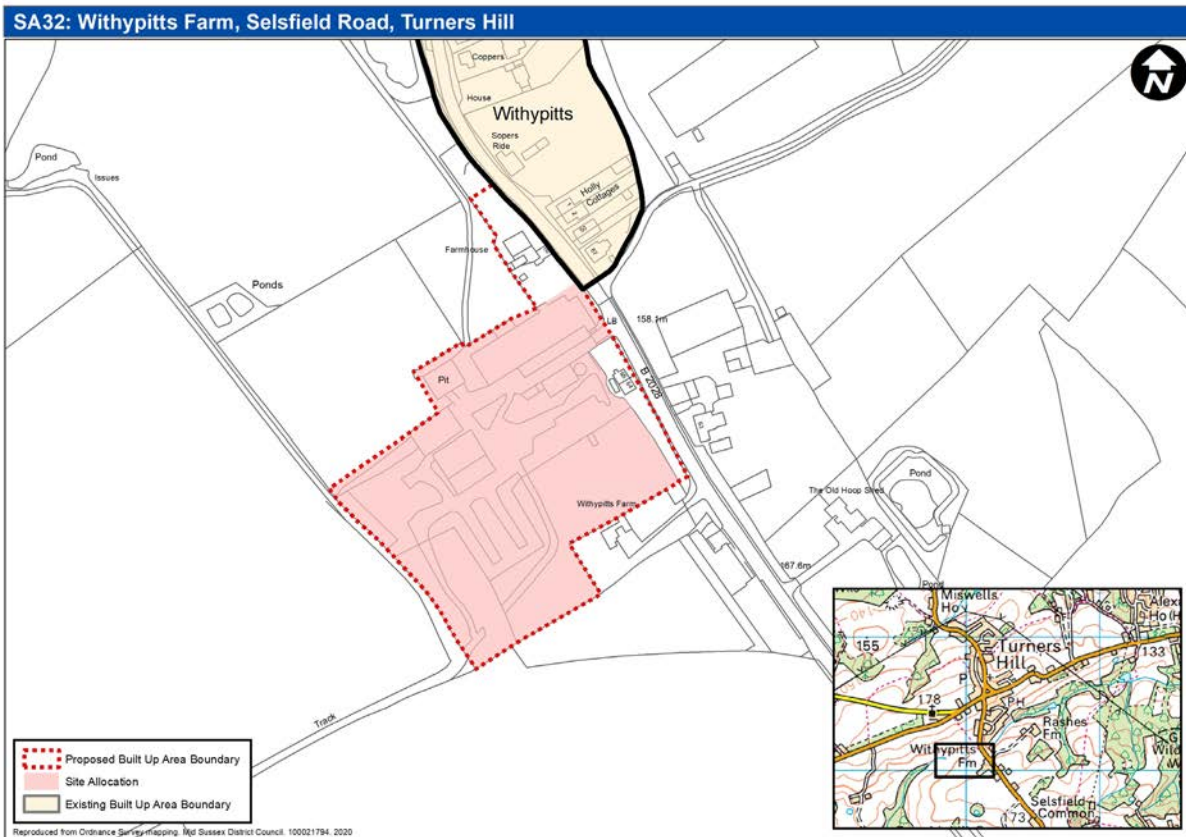
Minerals

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

SA 32

Withypitts Farm, Selsfield Road, Turners Hill

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



Objectives

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

Urban Design Principles

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

AONB

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

- Avoid use of close boarded fencing adjacent to any site boundaries where it will be visible in wider views.
- Development proposals will need to protect the character and amenity of existing PRow to the north of the site.

Historic Environment and Cultural Heritage

- Informed by a Heritage Assessment and structural survey, utilise existing buildings of historic value that are capable of conversion; new development should be focused on areas with existing and previous historic built form.
- Provide a layout that retains the farmstead character of the site. Any new development should respect this character in the design, incorporating materials which compliment those on the existing historic buildings.

Biodiversity and Green Infrastructure

- Undertake an holistic approach to Green Infrastructure and corridors, including biodiversity and landscape enhancements within the site connecting to the surrounding area.
- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancekent, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.

Highways and Access

- Investigate access arrangements onto Selsfield Road and make necessary safety improvements and contribute towards sustainable transport improvements.
- Provide safe and convenient routes for pedestrians and cyclists through the site.

Flood Risk and Drainage

- Following any necessary remediation of previously contaminated land and informed by permeability testing, Surface Water drainage shall be designed to incorporate SuDS and minimise run-off to ensure that Flood Risk is not increased.

Contaminated Land

- The land may be contaminated due to present or historical on site or adjacent land uses. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required.

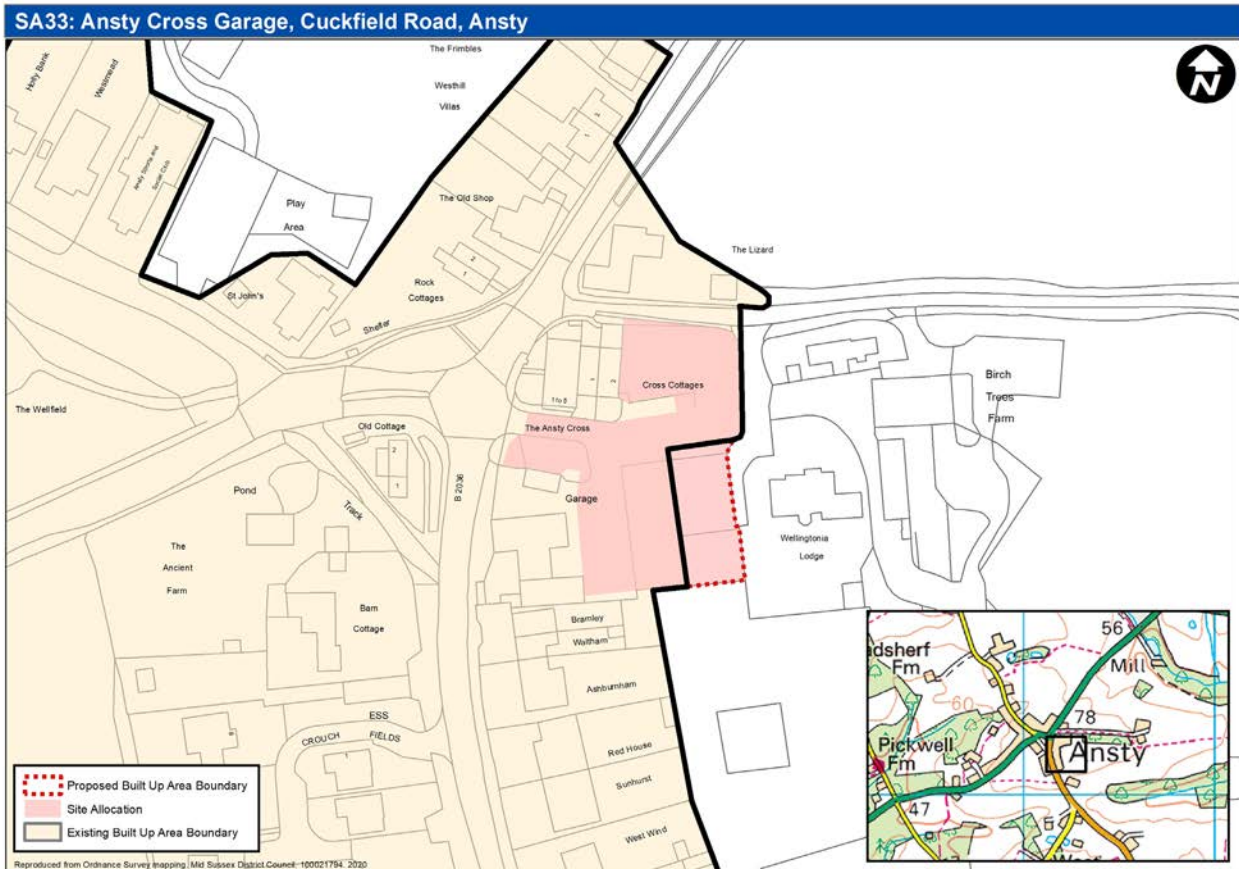
Minerals

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

SA 33

Ansty Cross Garage, Cuckfield Road, Ansty

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



Objectives

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

Urban Design Principles

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

Landscape Considerations

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

Historic Environment and Cultural Heritage

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

Air Quality / Noise
<ul style="list-style-type: none"> • A noise assessment shall inform any necessary mitigation required to provide an acceptable standard of accommodation for each of the dwellings, arising from the Ansty Service Station operations.
Biodiversity and Green Infrastructure
<ul style="list-style-type: none"> • Provide a net gain in biodiversity and Green Infrastructure, taking account of the wider ecological context, creating additional habitat in the construction of the building, including where appropriate integral bat and bird boxes and inclusion of well designed biodiverse landscaped areas with native species.
Highways and Access
<ul style="list-style-type: none"> • Investigate access onto the Cuckfield Road and make necessary safety improvements avoiding creating a new access onto the narrow lane to the north and contribution towards sustainable transport infrastructure improvements.
Flood Risk and Drainage
<ul style="list-style-type: none"> • Following any necessary remediation of previously contaminated land, Surface Water Drainage shall be designed to incorporate SuDS and significantly reduce any run off and to ensure Flood Risk is not increased.
Contaminated Land
<ul style="list-style-type: none"> • The land may be contaminated due to present or historical on site or adjacent land uses and is positioned over a secondary aquifer. Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required to ensure there is no risk to human health and/or groundwater supplies.
Utilities
<ul style="list-style-type: none"> • Southern Water's Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

3 Development Policies

3.1 The District Plan 2014-2031 sets out a comprehensive suite of forty two strategic policies to inform development across the district. The plan's policies seek to achieve a balance between delivering new housing, supporting economic growth and protecting the district's high quality natural and built environment.

3.2 In addition to the Sites DPD policies relating to site allocations (Policies SA1 to SA33), the District Plan policies are complemented by five additional strategic policies that are set out in the following section. These policies help to ensure that the Development Plan supports the delivery of sustainable development when considered as a whole. In the case of **SA38: Air Quality**, this policy replaces the relevant Air Quality section of **DP29: Noise, Air and Light Pollution**.

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

- **SA34: Existing Employment Sites**
- **SA35: Safeguarding of Land for Strategic Highway Improvements**
- **SA36: Wivelsfield Railway Station**
- **SA37: Burgess Hill/ Haywards Heath Cycle Network**
- **SA38: Air Quality**

3.4 The review of the District Plan, to commence in 2020 will provide a further opportunity to update the Council's policies to support sustainable development if required.

Existing Employment Sites

3.5 District Plan Policy **DP1: Sustainable Economic Development** sets out the policy position related to making effective use of employment land and premises. The policy provides broad support for intensification, conversion, redevelopment and/or extension provided it is in accordance with other policies in the plan. It also seeks to protect allocated and existing employment land.

3.6 Since the District Plan was adopted in March 2018, the Council have approved an updated Economic Development Strategy (EDS) (April 2018). The aim of the EDS is to make Mid Sussex a vibrant and attractive place for businesses and people to grow and succeed. The EDS sets out a number of success measures, broadly within four priority themes:

- Places
- People
- Premises
- Promotion

3.7 Regarding the Premises theme, the EDS aims to increase the amount of business floorspace in the District, as well as minimising the loss of floor space. The following policy (**SA34: Existing Employment Sites**) supplements District Plan Policy DP1 by providing additional policy requirements relating to the protection of existing sites, whilst supporting their growth where appropriate.

SA34: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

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

Development proposals outside the traditional employment use classes 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.

Development proposals outside the traditional employment use classes 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 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.

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

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

Existing Employment Areas – Expansion

Within the built-up area, expansion of Existing Employment Sites and premises for 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
- Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.

Safeguarding of Land for Strategic Highway Improvements

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

- road congestion during peak periods affects many parts of the highway network throughout the district; most notably:
- M23/A23 corridor which is congested at key junctions; A23/A2300 Hickstead, A23/A272 Bolney, A23/A264 Pease Pottage and M23 J10 Cophorne
- East Grinstead is affected by the A264 and the A22 passing through the town centre and high car dependency due partially to the lack of a direct rail connection to the Crawley / Gatwick Airport area and bus journey times can be uncompetitive;
- Haywards Heath is particularly affected by the A272 passing around the town and high car dependency;
- Burgess Hill suffers from congestion due to the lack of crossing points for vehicles crossing the Brighton Main Line within the town and high car dependency; and
- there is a lack of good public transport operating within the rural locations meaning that individuals with no access to private cars have limited options for accessing key services such as hospitals, shops and leisure facilities.

3.9 A Strategic Objective of the District Plan 2014 - 2031¹³ is to ensure that development is accompanied by the necessary infrastructure to support new development and **DP 21: Transport** ensures that development supports the objectives of the West Sussex Transport Plan 2011 – 2026 and contributes towards delivering sustainable development and appropriate infrastructure.

3.10 The West Sussex Transport Plan 2011 – 2026¹⁴ outlines a strategy for Mid Sussex that seeks to tackle the identified transport issues, partly through seeking external funding sources to deliver new infrastructure and by ensuring that new development contributes to delivering the strategy. It is stated that all new developments should contribute to:

- improving public transport facilities and networks
- increasing the use of sustainable modes of transport
- improving network efficiency in order to reduce delays and emissions
- improving safety for all road users, and
- improving the public rights of way network in accordance with the RoWIP.

3.11 Development identified in the District Plan 2014 – 2031 is accompanied by a committed list of highway infrastructure to be constructed in Mid Sussex and neighbouring districts by 2031. These schemes have been identified in partnership with West Sussex County Council and other key stakeholders. Details of the highway and transport infrastructure already identified is as set out within the Transport Assessment Report¹⁵.

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

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

3.12 Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant corridor) have been fully explored and have been taken into account in terms of their level of mitigation.

3.13 The additional development proposed by the Site Allocations DPD has been subject to further technical investigations, working in partnership with West Sussex County Council and further highway and transport infrastructure has been identified to ensure that proposed development is sustainable.

3.14 The planning and funding of highway and transport infrastructure can take time to prepare and it is therefore important the Development Plan is not compromised by inappropriate development occurring in the interim that may prevent highway schemes being delivered.

3.15 To support the delivery of strategic highway and sustainable transport infrastructure, land will be identified for safeguarding in accordance with **SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements** for the following schemes, subject to further detailed work. This approach will ensure the long-term delivery of these schemes is not prejudiced whilst more detailed feasibility work is undertaken in partnership with West Sussex County Council, relevant neighbouring authorities and other key stakeholders.

- upgrades to the A23 Junction at Hickstead to increase the capacity of this junction in the longer-term, which could include extending the slip roads, particularly for accessing the A2300.
- upgrades to the A264 Copthorne Hotel Junction and to the A22 Felbridge, Imberhorne Lane and Lingfield Road Junctions. These upgrades are necessary to increase capacity and improve highway safety within Mid Sussex and support planned growth in Tandridge and are being developed in partnership with West Sussex and Surrey County Councils.

3.16 The areas to be safeguarded will be informed by more detailed design and feasibility work, to be carried out in consultation with West Sussex County Council and other relevant parties; this will be subject to further consultation.

.....
¹⁵ Mid Sussex District Council (2019) Mid Sussex Transport Study - Transport Impacts Scenarios Reports.

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

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

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

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

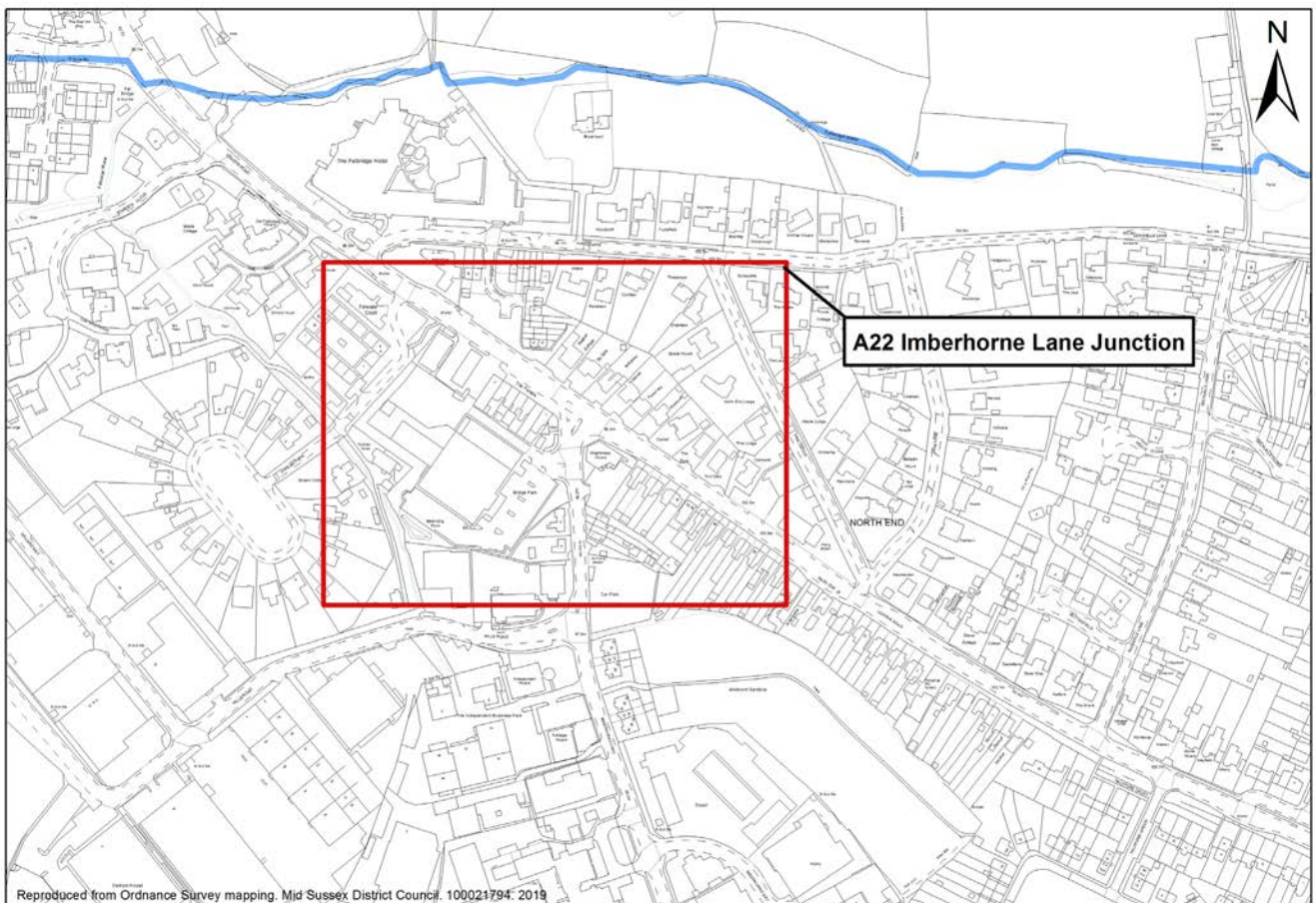
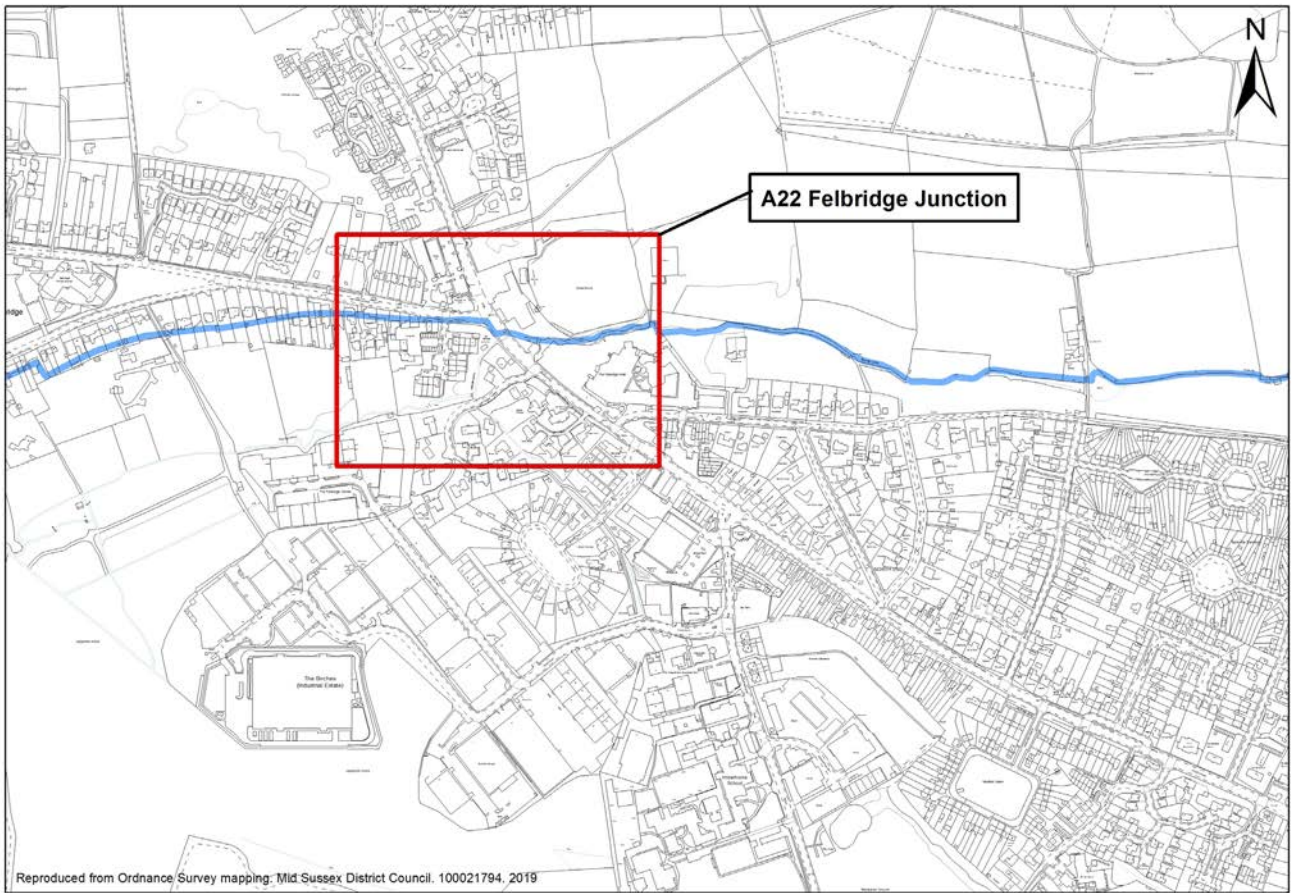
Any proposals for development that may reasonably be considered to impact the delivery of the identified transport schemes, as listed above is required to demonstrate the proposal would not harm their delivery.

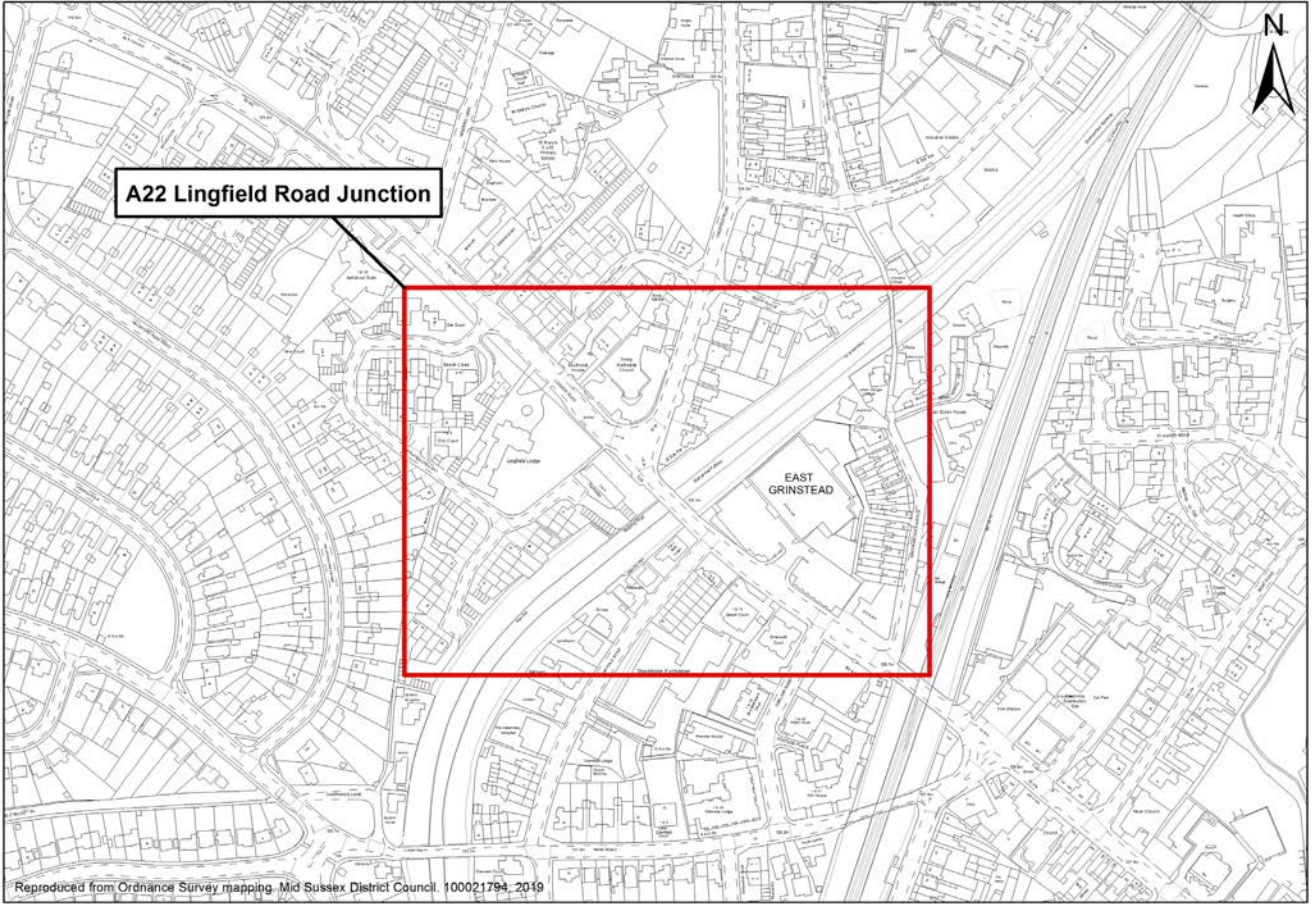
Planning permission will not be granted for development that would prejudice the construction or effective operation of the transport schemes listed.

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

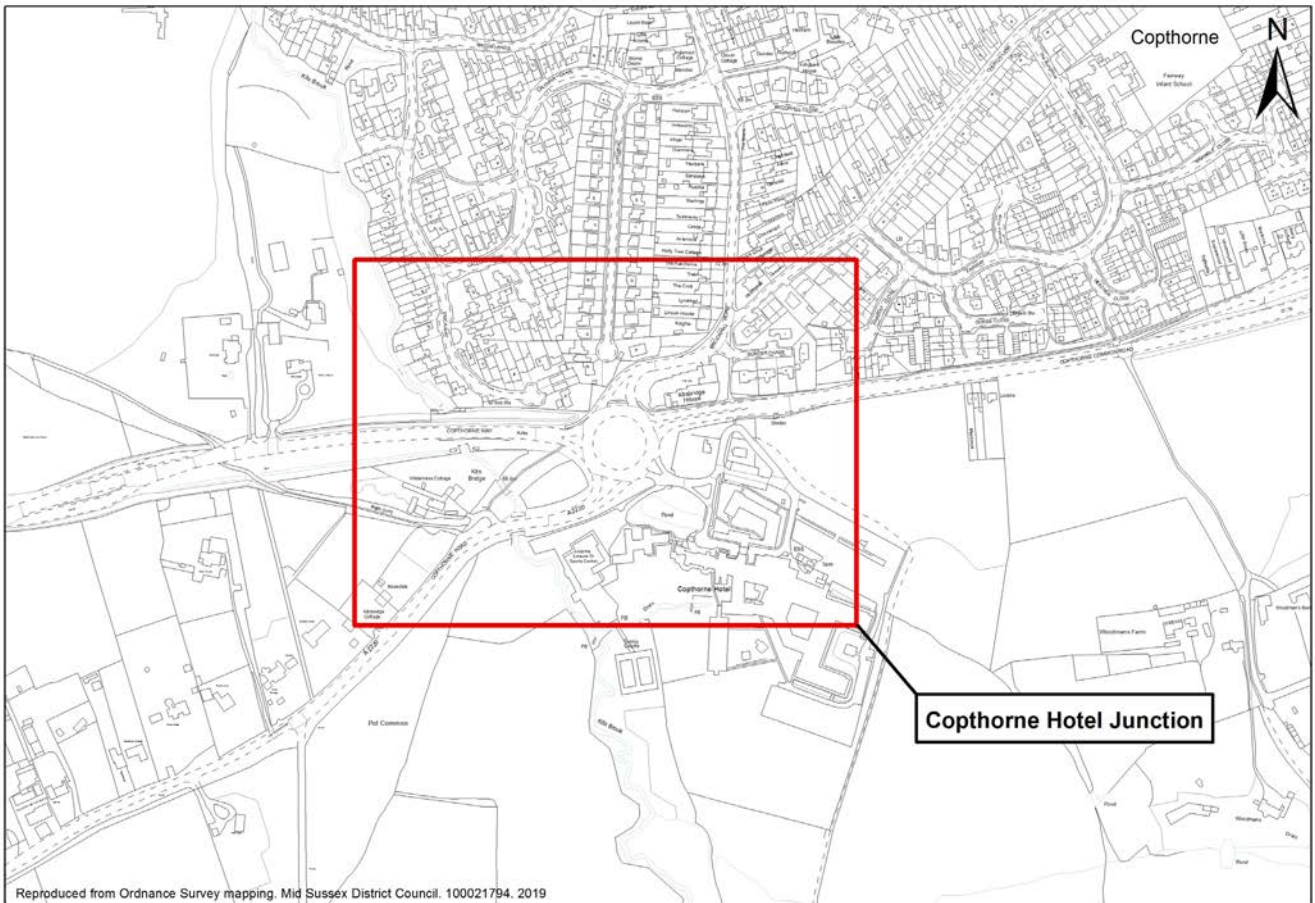
* The areas to be safeguarded will be informed by more detailed design and feasibility work to be carried out in consultation with WSCC and other relevant parties and will be subject to further consultation.

A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions

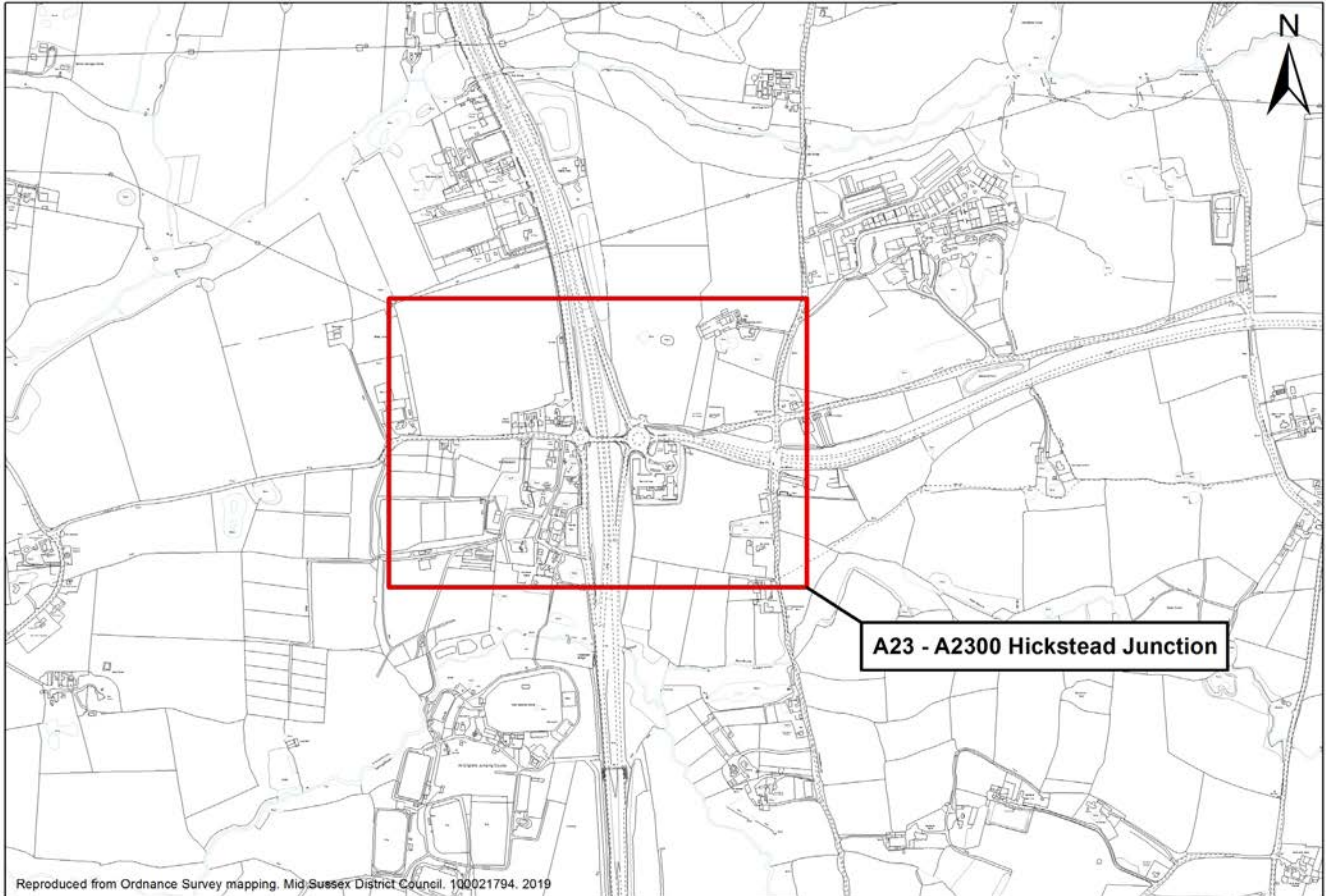




A264 Corridor upgrades at Copthorne Hotel Junction



A23 junction upgrades at Hickstead



Wivelsfield Railway Station

3.17 Wivelsfield Railway Station is located on the Brighton Mainline and serves as a public transport hub. This role will significantly increase due to its proximity to the strategic residential and employment allocations to the north and north-west of Burgess Hill and east of Burgess Hill as set out in the District Plan 2014-2031.

3.18 The Council has a long-standing ambition to expand and upgrade facilities at Wivelsfield Railway Station to improve the efficiency and effective operation of the station and increase the use of sustainable modes of travel and make it more attractive to users. This ambition includes station platform and ticket office accessibility, station area public realm enhancements; car and cycle parking provision with electric charging points; passenger pick up and drop off points, upgraded bus stop infrastructure; and the provision of cycle links to directly connect with on-going cycle routes to key locations.

3.19 Whilst the area in question is identified within the Burgess Hill Neighbourhood Plan as Local Green Space, the proposed enhancements to the station are consistent with the Neighbourhood Plan Policy S2: Wivelsfield Station and Worlds End that supports 'enhancements to the accessibility of Wivelsfield Station for all users will be encouraged and supported to enhance the sustainability of the town'. Improvements to the station would not be deliverable without using the land in question, which adjoins the existing railway station; it is therefore proposed that the areas covered by Policy SA36 would supersede the LGS designation.

3.20 Achieving the ambition will require the use of land located to the west of the station. Land to the west of Wivelsfield Railway Station is therefore safeguarded to support the delivery of a package of improvements in accordance with **SA36: Wivelsfield Railway Station**. This approach ensures that multi-phased delivery of the scheme is not prejudiced.

3.21 It is important to note that any areas safeguarded are indicative and will be subject to detailed design work.

SA36: Wivelsfield Railway Station

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

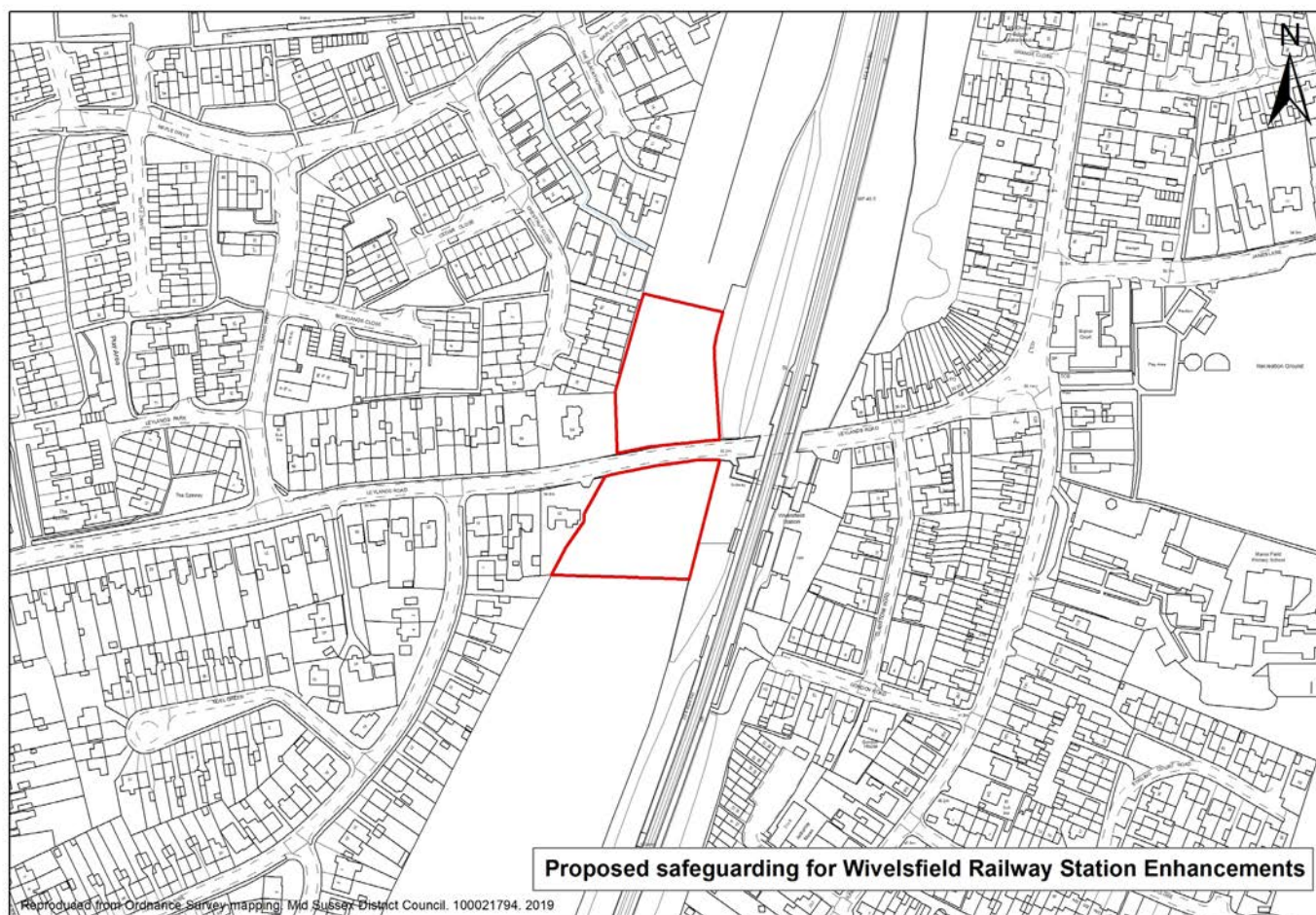
Land to the west of Wivelsfield Railway Station is safeguarded to support the delivery of a package of improvements to expand and upgrade Wivelsfield Railway Station.

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

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

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

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



Burgess Hill to Haywards Heath Multifunctional Network

3.22 The Council is committed to delivering an ambitious programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill as set out in the District Plan 2014-2031.

3.23 Despite Burgess Hill and Haywards Heath being less than three miles apart, there is no realistic traffic free means of travelling between the two towns. Delivering a strategic multifunctional (walking/cycling/equestrian) network between Burgess Hill and Haywards Heath would have multiple benefits including the potential to promote road safety by taking such uses away from the road highway; provide commuting alternatives and support local businesses, reduce the use of the private car and tackle congestion, promote social mobility and cohesion and support healthy lifestyles.

3.24 Work has progressed to bring forward a package of sustainable transport infrastructure improvements to Burgess Hill. This has identified the potential for a dedicated multifunctional network between Burgess Hill and Haywards Heath.

3.25 A number of route options are being investigated to the east and west of the Brighton main railway line and these include, for example, opportunities to connect strategic development to the north and north west of Burgess Hill, including a new secondary school to be developed, and with Haywards Heath that is away from the road highway.

3.26 To support the delivery of the Burgess Hill/ Haywards Heath Multifunctional Network, land is therefore safeguarded in accordance with **SA37: Burgess Hill/ Haywards Heath Multifunctional Network**. This approach ensures that multi-phased delivery of the scheme is not prejudiced.

3.27 It is important to note that any areas safeguarded are indicative and will be subject to detailed design work. In addition, the Council does not consider the use of Compulsory Purchase of private property appropriate to facilitate any route.

SA37: Burgess Hill/ Haywards Heath Multifunctional Network

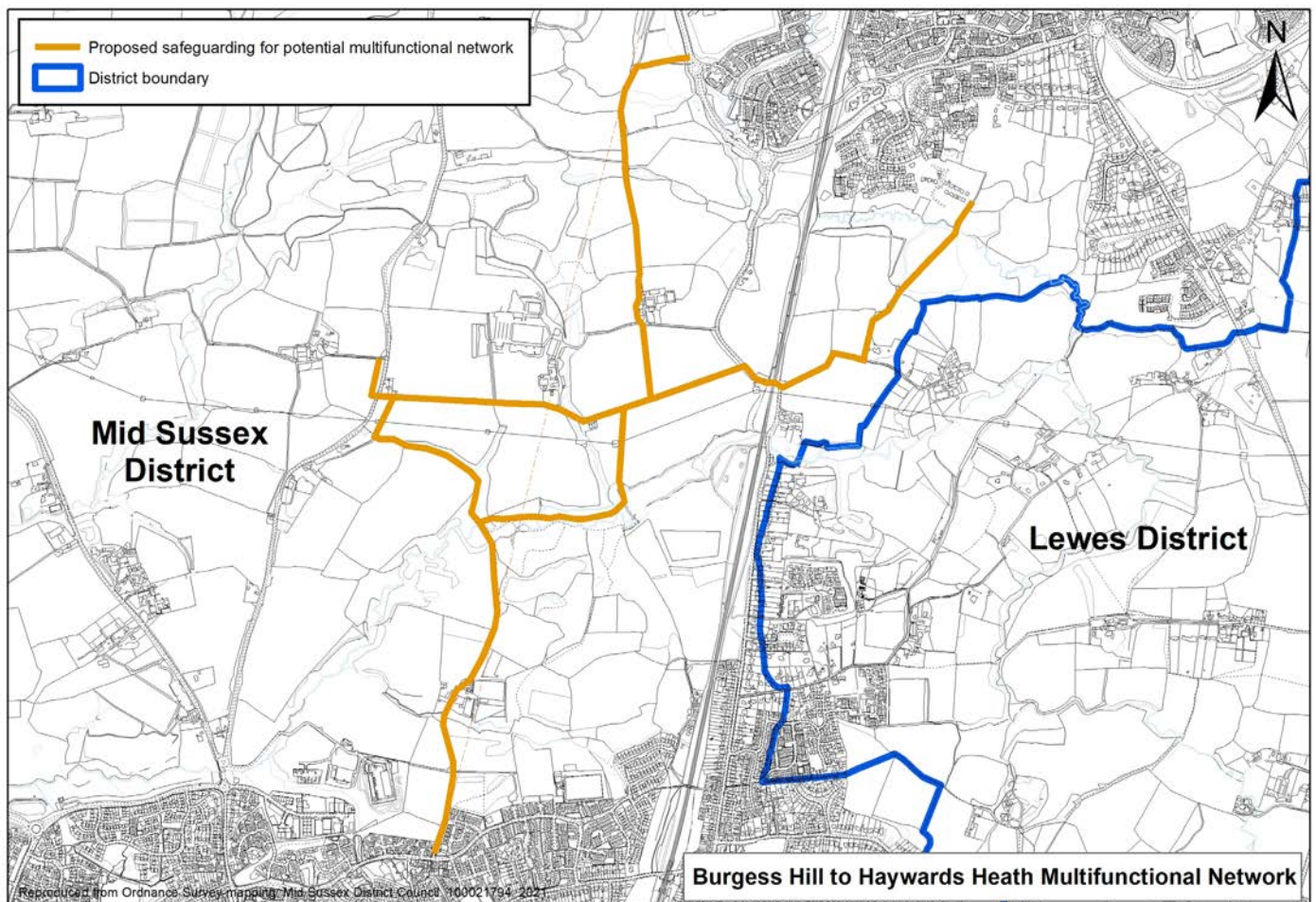
The Council continues to support the delivery of a dedicated multifunctional network, within the lifetime of this plan and will work with key stakeholders to ensure opportunities to deliver the scheme are prioritised and maximised.

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

The area shown on the Policies Map illustrates where **SA37** will apply; the precise alignment for the scheme will be informed by detailed design work and it should be carefully designed having a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features.

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

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



Air Quality

3.28 National planning policy is clear on the importance of taking into account the potential impacts on air quality when assessing development proposals. In particular, national policy identifies the importance of preventing new and existing development from either contributing to or being put at unacceptable risk from pollution and that new development is appropriate taking into account any likely effects.¹⁶

3.29 Furthermore, legislative¹⁷ limits are set for concentrations of major air pollutants that may impact on public health, amenity and local biodiversity, such as airborne particulate matter and nitrogen dioxide.

3.30 Air quality within Mid Sussex District is predominantly good and there is only one currently known location where air pollution exceeds the levels set by European and UK regulations. For this reason, the Council has declared one Air Quality Management Area (AQMA) that relates to elevated levels of nitrogen dioxide (NO²) at Stonepound Crossroads, Hassocks.

3.31 Development proposals located in proximity to an AQMA will need to assess the impact on air quality and have regard to the Council's Air Quality Action Plan.¹⁸

3.32 Any development that is likely to generate traffic will need to assess its impact on air quality. The level of assessment will be based on the proposed development's proximity to an AQMA and the amount of increase in traffic for human health protection and potential impact on protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Sites of Special Scientific Interest (SSSIs).

3.33 Proposals will also be considered in accordance with **SA38: Air Quality** that replaces District Plan Policy DP29 in relation to air quality. Early engagement with the Council's air quality officer is encouraged to help ensure the approach taken is acceptable.

3.34 It is likely that a detailed Air Quality Assessment will be required, where proposals are of a large scale and/ or likely to have a significant or cumulative impact upon air quality, particularly where development is located in, or within relevant proximity, to an AQMA. The level of assessment will depend on the nature, extent and location of the development. Besides a development-related traffic emissions assessment, a dust construction assessment may also be required.

3.35 Any air quality assessments and other related work should be undertaken by a competent person/ company¹⁹ in line with best practice and the Air Quality and Emissions Mitigation Guidance for Sussex 2021²⁰, or its replacements. This guidance requires that appropriate levels of mitigation are detailed to reduce air quality impacts.

3.36 Increased traffic emissions as a consequence of new development may result in atmospheric pollution on the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)²¹.

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

¹⁷ The Air Quality Standards Regulations 2010

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

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

²⁰ Air Quality and Emissions Mitigation Guidance for Sussex (2021)

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

The main impacts of interest are acid deposition and eutrophication by nitrogen deposition, as well as NO_x concentrations. High levels of nitrogen may detrimentally affect the composition of an ecosystem and lead to loss of species, whilst high levels of NO_x concentrations may lead to leaf damages and reduced growth. The District Council has undertaken a Habitats Regulations Assessment of the implications of the Site Allocations DPD for the Ashdown Forest SPA and SAC in view of that protected site's conservation objectives and to ensure no significant adverse effect on the integrity of the Ashdown Forest SPA and SAC. However, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), development proposals will need to consider any potential impacts, including in combination with other development. Additional information may need to be provided by the applicant for the purposes of undertaking a Habitats Regulations Assessment in accordance with SA38 and **DP 17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)**.

SA38: Air Quality

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

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

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

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

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

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

SA39: Specialist Accommodation for Older People and Care Homes

The Council's Housing and Economic Development Needs Assessment (HEDNA, August 2016) supporting the District Plan established the Council's need for specialist accommodation for older people (Use Class C2).

In order to contribute towards meeting the needs of these specialist types of accommodation, policy SA39: Specialist Accommodation for Older People and Care Homes provides support for such uses providing certain requirements are met.

SA39: Specialist Accommodation for Older People and Care Homes

There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold.

The Housing and Economic Development Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) at 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.

Proposals for specialist accommodation for older people and care homes will be supported where:

- a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood Plan; or
- b) It forms part of a strategic allocation; or
- c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or
- d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (policy DP4).

In all circumstances, the site must be accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. Proposals must demonstrate how reliance on the private car will be reduced and be 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, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

4 Implementing the Plan

4.1 One of the key tests of an effective development plan is that it is deliverable. The Council has a range of mechanisms which it can use to ensure the Site Allocations DPD objectives and policies are effective, including partnership working with landowners, developers and strategic stakeholders, and use of its own powers, land and assets.

4.2 In line with the NPPF and in order to foster sustainable development the Council has a positive approach to decision taking over planning applications which accord with the development plan.

4.3 However, it recognises that there are many factors that can influence the timely development of sites including land assembly, changes in ownership, changes in the economy and speed of delivery of required infrastructure. In order to address these risks and maintain a rolling 5 year housing land supply the Council will:

- continue to closely monitor the commitment and completion of sites;
- continue to work closely with developers, landowners and promoters of sites to ensure delivery within agreed timescales;
- work with Town and Parish Councils to bring forward Neighbourhood Plan allocations in line with District Plan policies DP4: Housing and DP6: Settlement Hierarchy and support further Neighbourhood Plan preparation;
- continue working with a Developers' Liaison Group in order to understand issues regarding site supply and development constraints; and
- prepare, maintain and publish and update regularly a Brownfield Sites Register.

4.4 The Council has worked in partnership with a range of strategic organisations (including the Coast to Capital LEP; the Gatwick Diamond Initiative; and the West Sussex and Greater Brighton Strategic Planning Board) to make sure that sub-regional issues are addressed.

Monitoring of the Sites DPD

4.5 Monitoring is an essential component of the plan-making process. The purpose of monitoring is to assess whether the policies of the documents produced as part of the Development Plan are achieving the objectives and intended policy outcomes, whether they are having any unintended consequences and whether they are still relevant or require a review. It is important that there are mechanisms in place for the Council to identify changing circumstances and take appropriate action if required.

4.6 The Mid Sussex District Plan 2014-2031 sets out a comprehensive Spatial Strategy and Strategic Policies that shapes the pattern, amount and type of future development in the District. These policies are subject to their own monitoring framework, in Chapter 5 of the District Plan. As a supplementary document to the District Plan, the additional allocations and policies in the Site Allocations DPD complement the Spatial Strategy and Strategic Policies set out in the District Plan. Therefore, monitoring of the Site Allocations DPD will also build upon the monitoring framework established in the District Plan.

4.7 The monitoring schedule (**Appendix B**) sets out a range of indicators that assess the impact of policies in the Site Allocations DPD. It is important that the indicators chosen can be monitored in a robust and consistent way. The indicators are reported through the Council's monitoring information and will be made available as soon as possible. If it appears that policies are not being effective, or are no longer appropriate in the light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

APPENDICES

Appendix A: Existing Employment Sites

Appendix B: Monitoring Framework

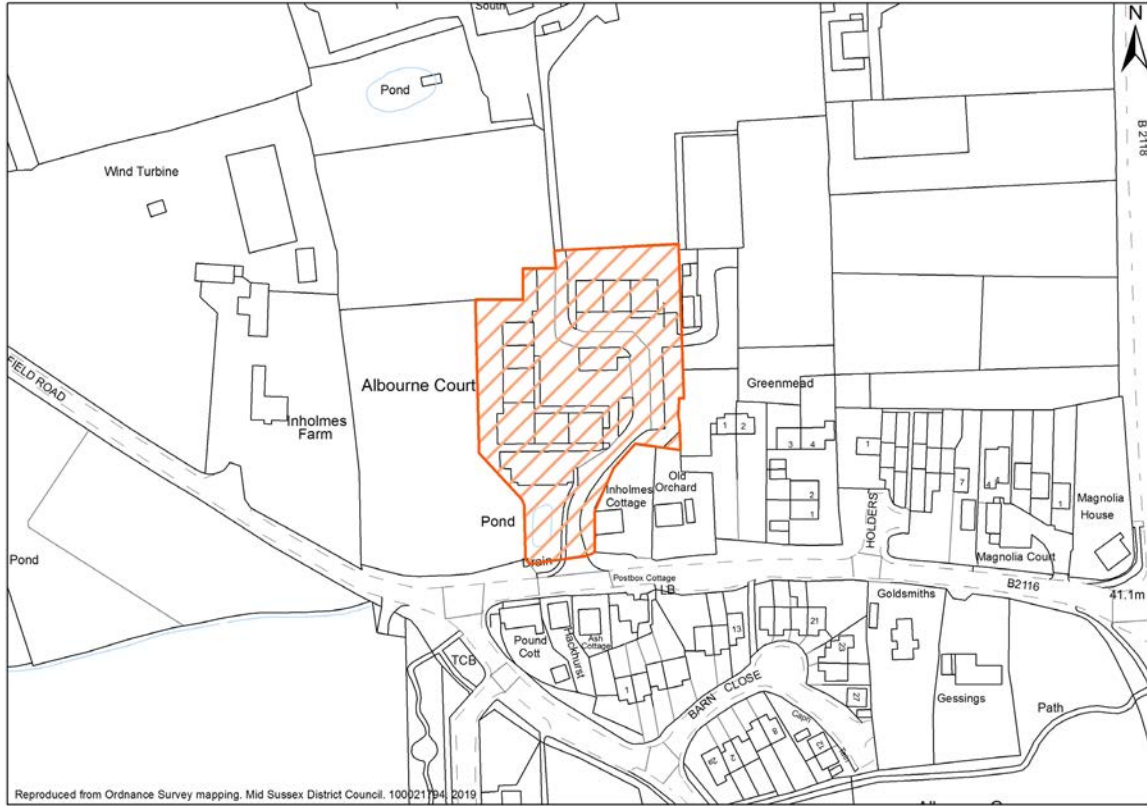
Appendix C: Housing Trajectory

Glossary

Appendix A: Existing Employment Sites

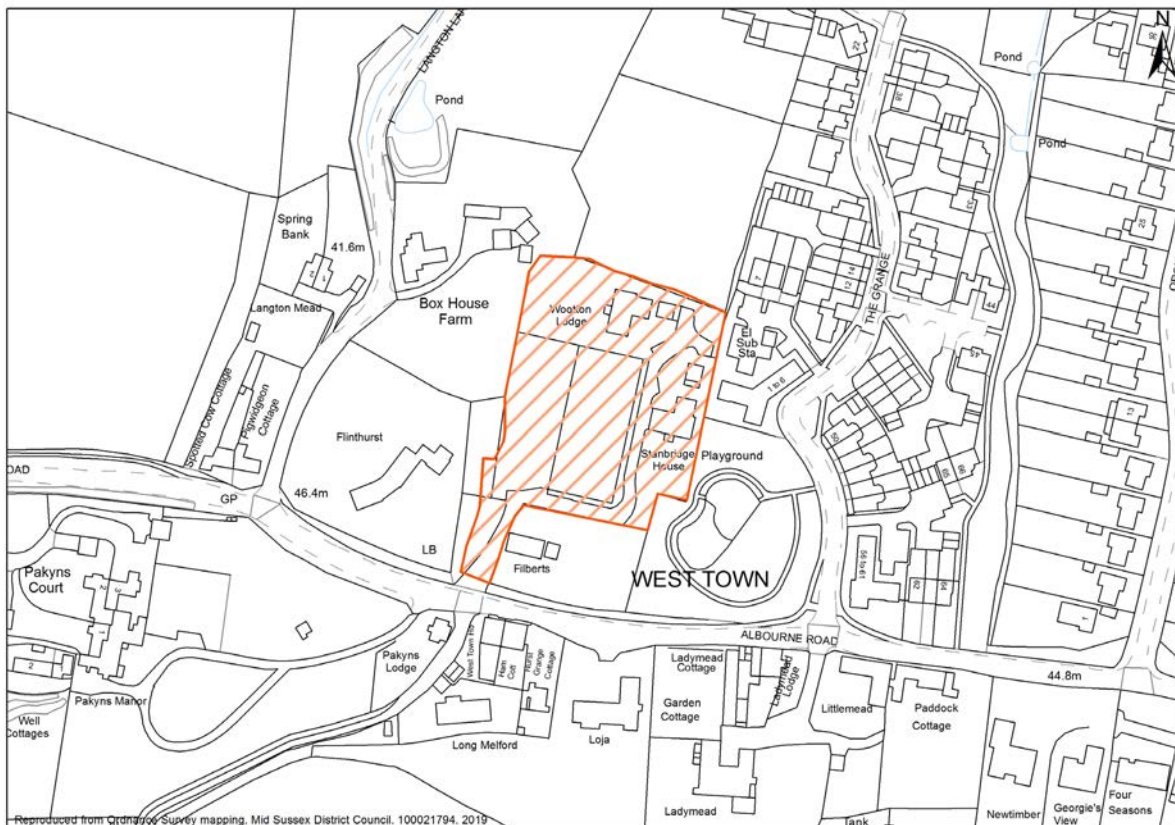
Albourne Court, Henfield Road, Albourne

SHELAA: 861 Settlement: Albourne Gross Site Area (ha): 0.6



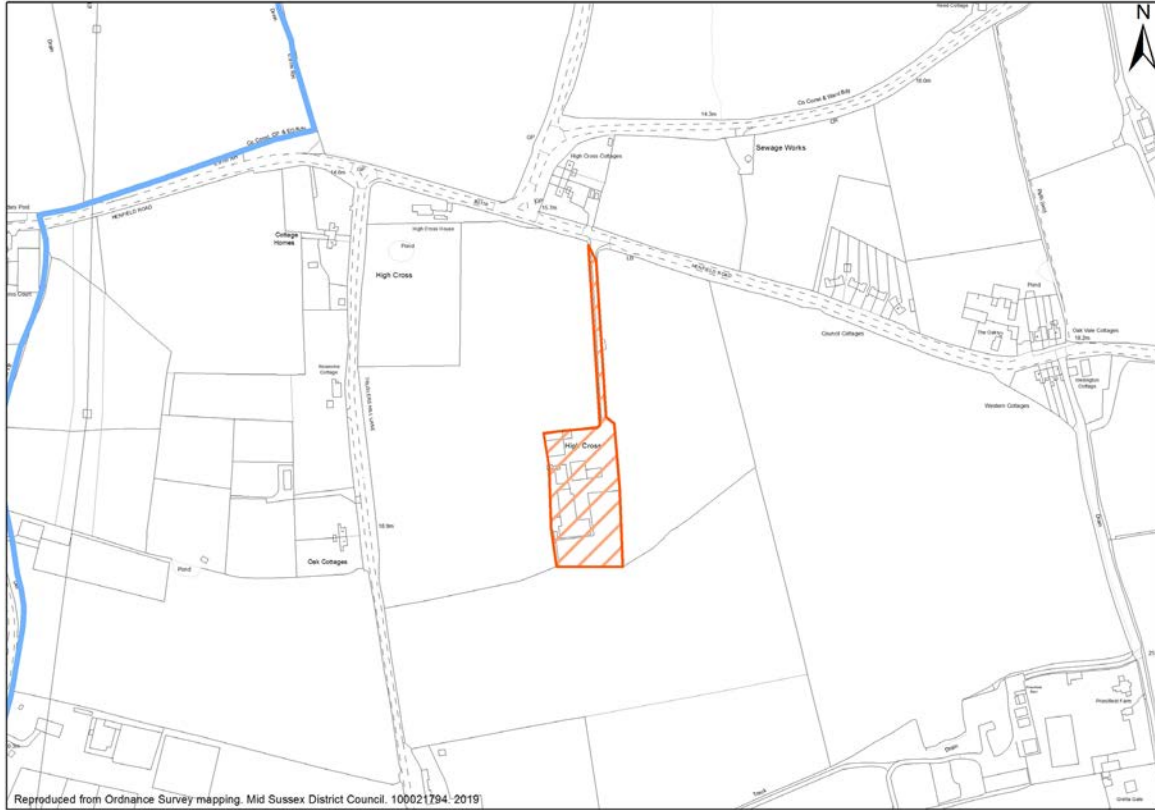
Box House Poultry Farm, Albourne Road

SHELAA: 859 Settlement: Albourne Gross Site Area (ha): 0.68



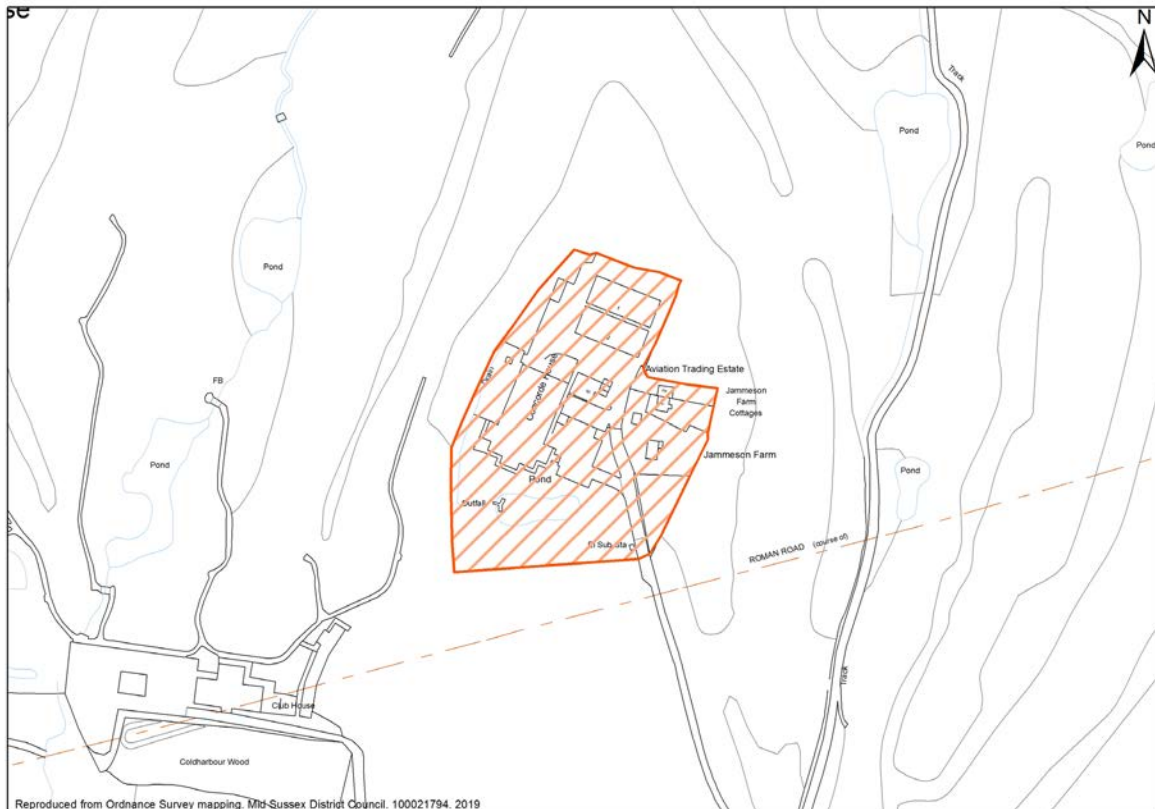
High Cross Farm, Henfield Road, Albourne

SHELAA: 860 Settlement: Albourne Gross Site Area (ha): 0.7



Jammeson's Farm, Muddleswood Road, Albourne

SHELAA: 941 Settlement: Albourne Gross Site Area (ha): 1.8



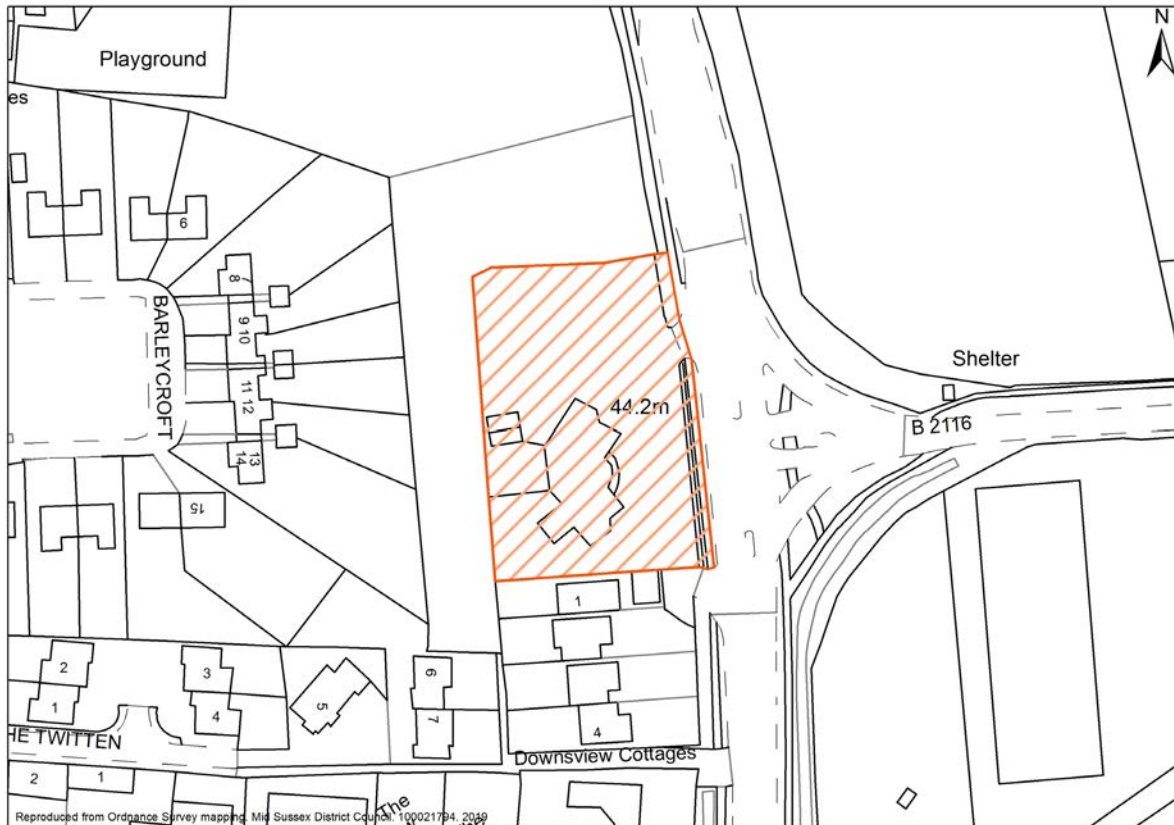
Sovereign House, London Road, Albourne

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



Softech House, London Road, Albourne

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



The Old Sawmill, Pickwell Lane, Ansty

SHELAA:

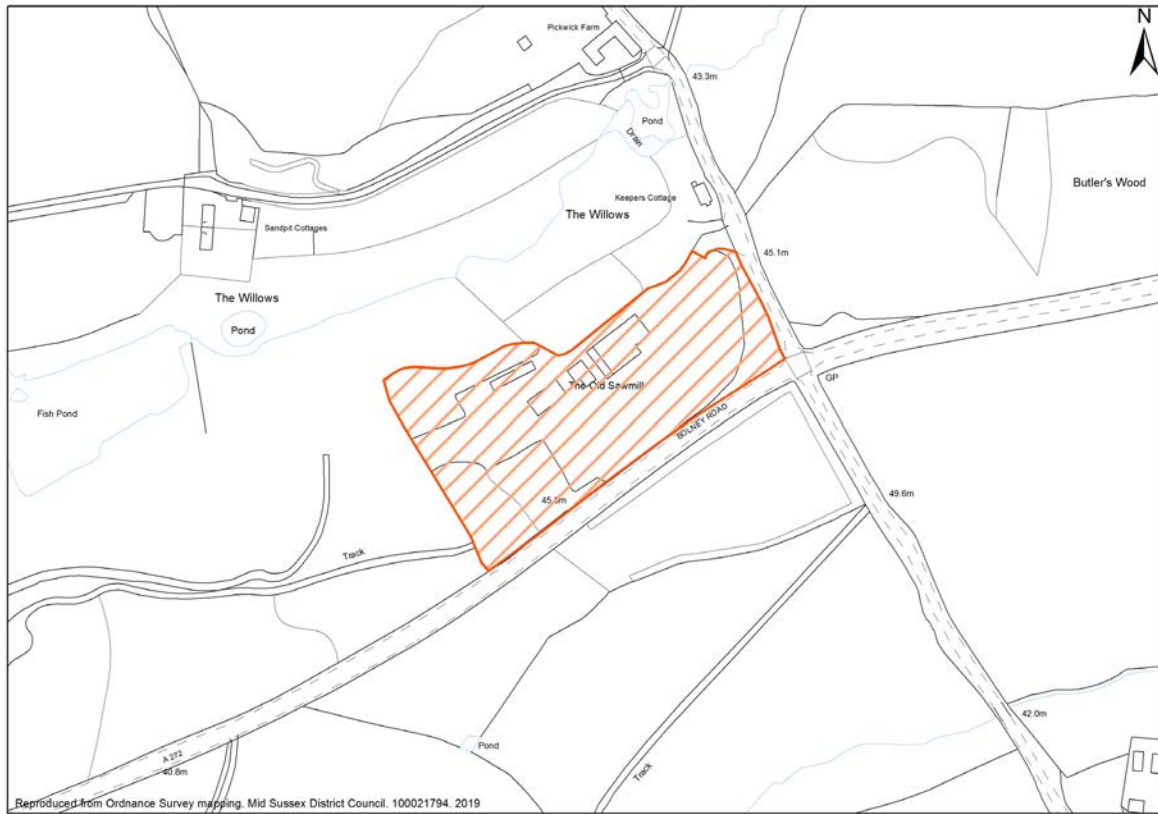
934

Settlement:

Ansty

Gross Site Area (ha):

1.5



Ivy Dene Industrial Estate, Ivy Dene Lane, Ashurst Wood

SHELAA:

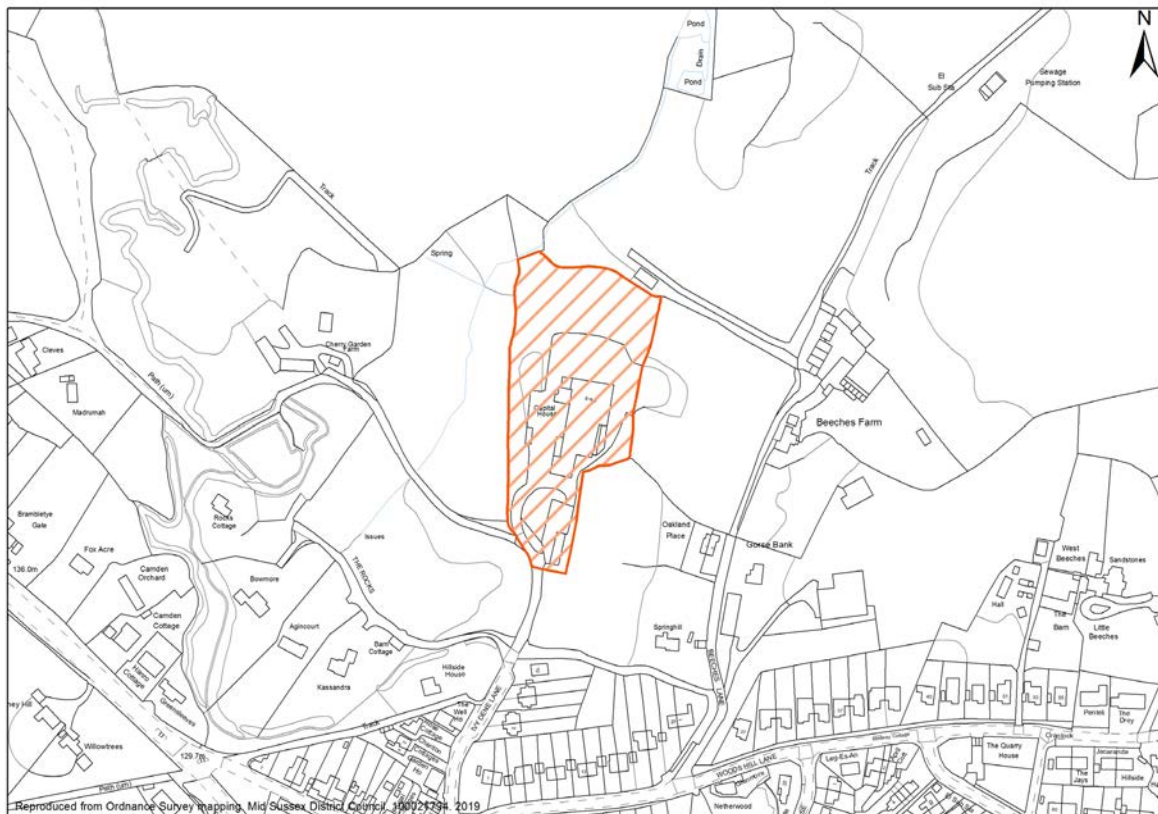
182

Settlement:

Ashurst Wood

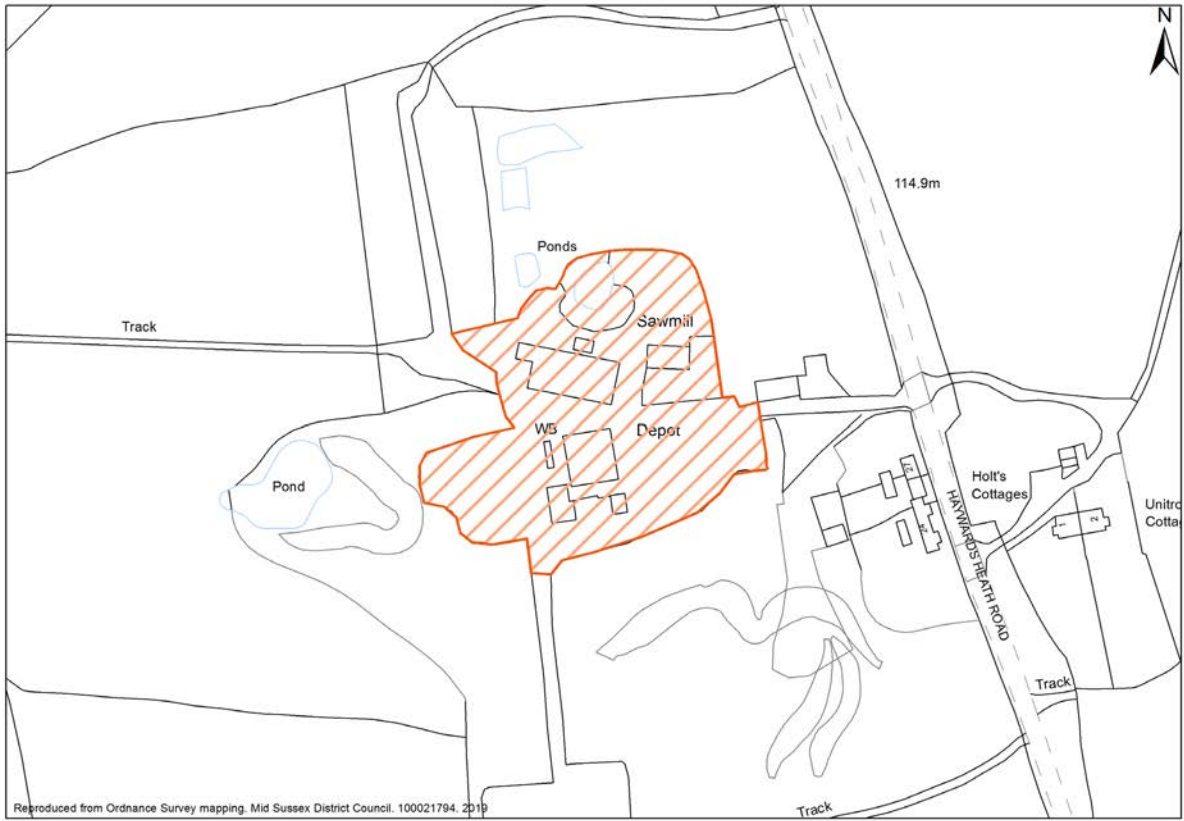
Gross Site Area (ha):

1.1



Balcombe Saw Mills, Haywards Heath Road, Balcombe

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



Glebe Farm, Haywards Heath Road, Balcombe

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



Ricebridge Works, Brighton Road, Bolney

SHELAA:

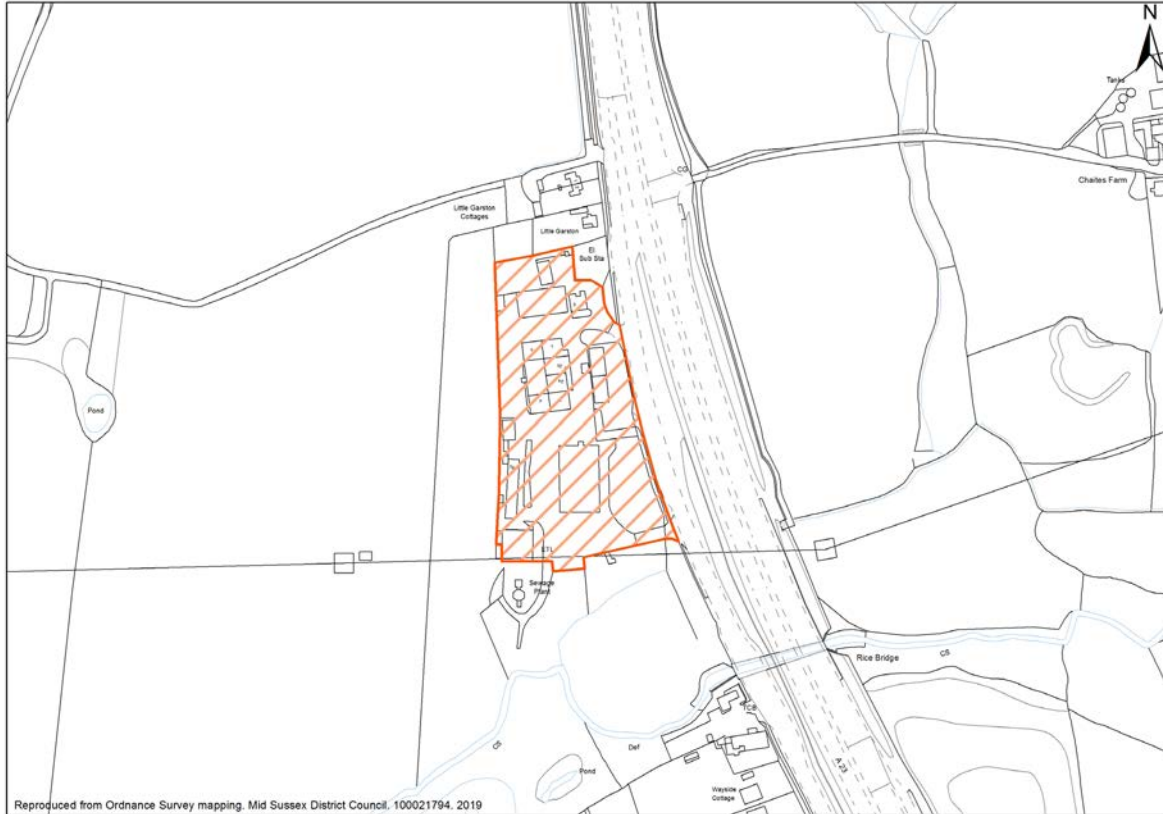
863

Settlement:

Bolney

Gross Site Area (ha):

1.7



Bolney Grange Business Park

SHELAA:

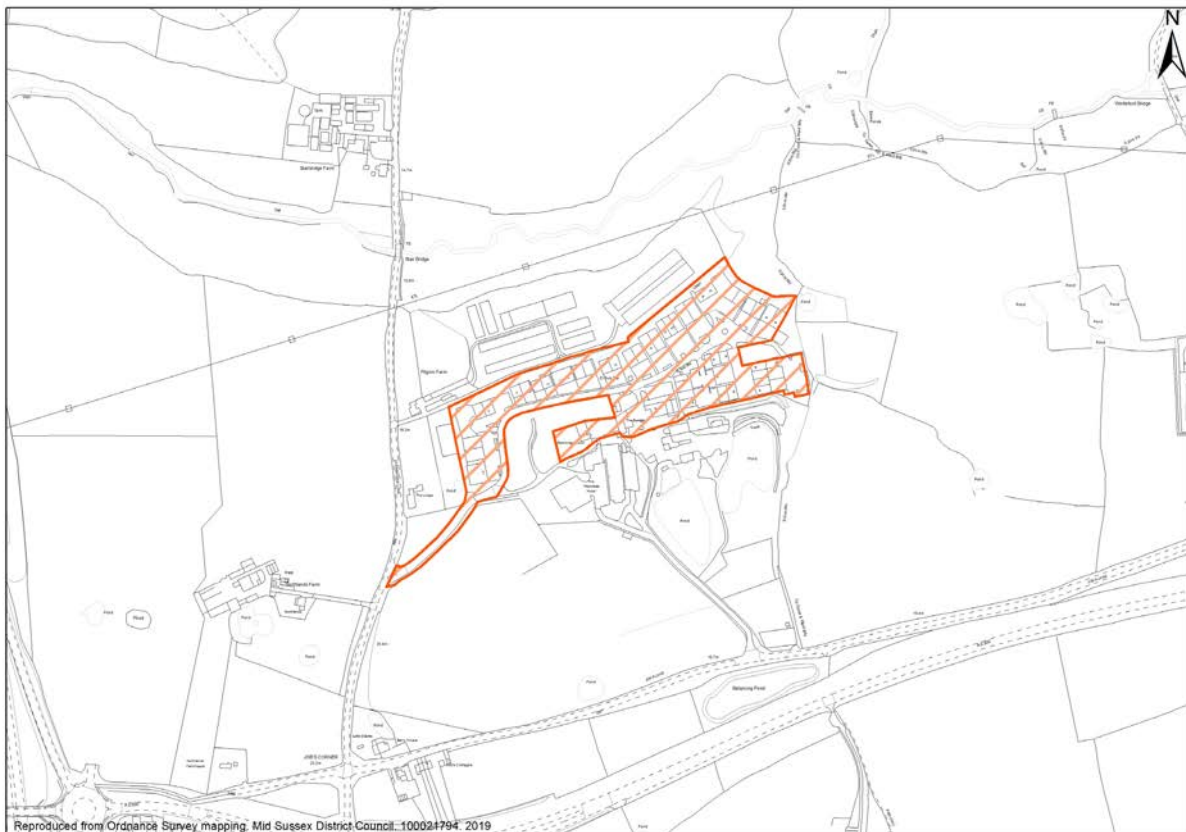
862

Settlement:

Bolney

Gross Site Area (ha):

4.1



Sheddingdean Business Centre, Marchants Way, Burgess Hill

SHELAA:

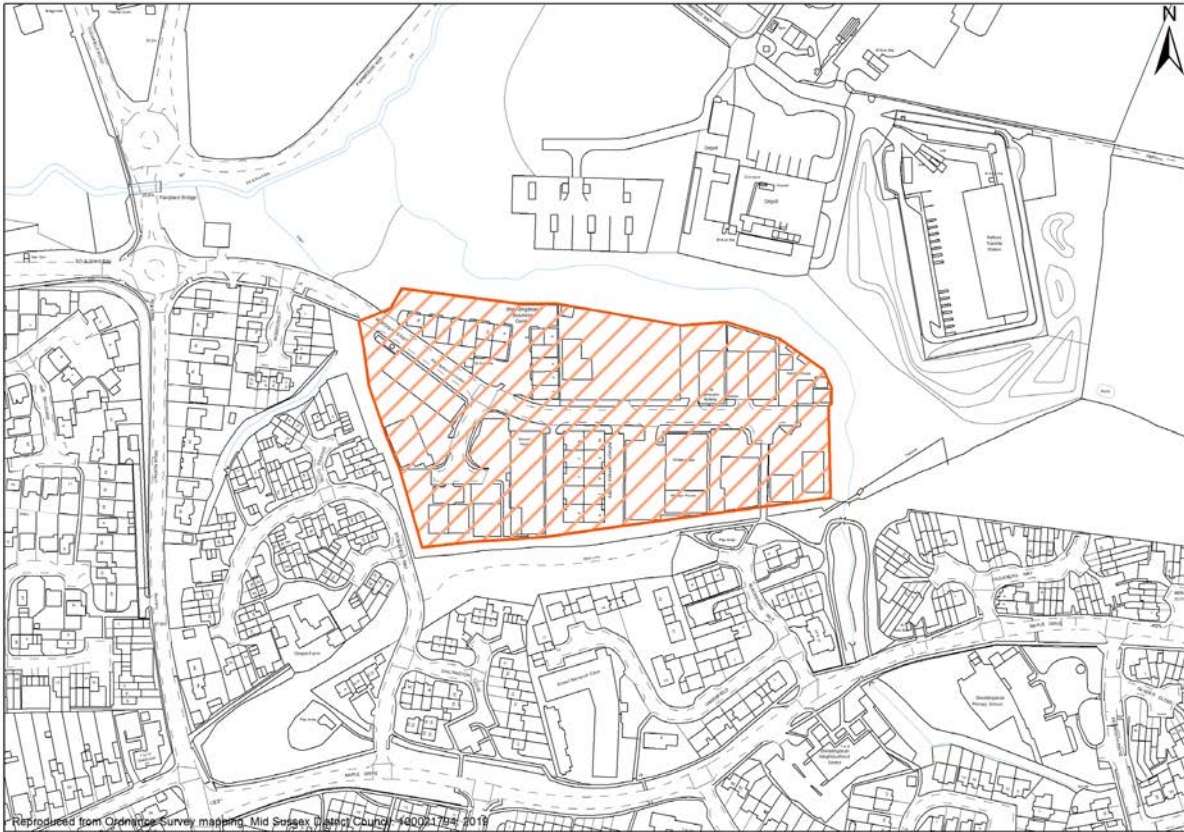
909

Settlement:

Burgess Hill

Gross Site Area (ha):

3.2



Moonhill Farm, Burgess Hill Road, Ansty

SHELAA:

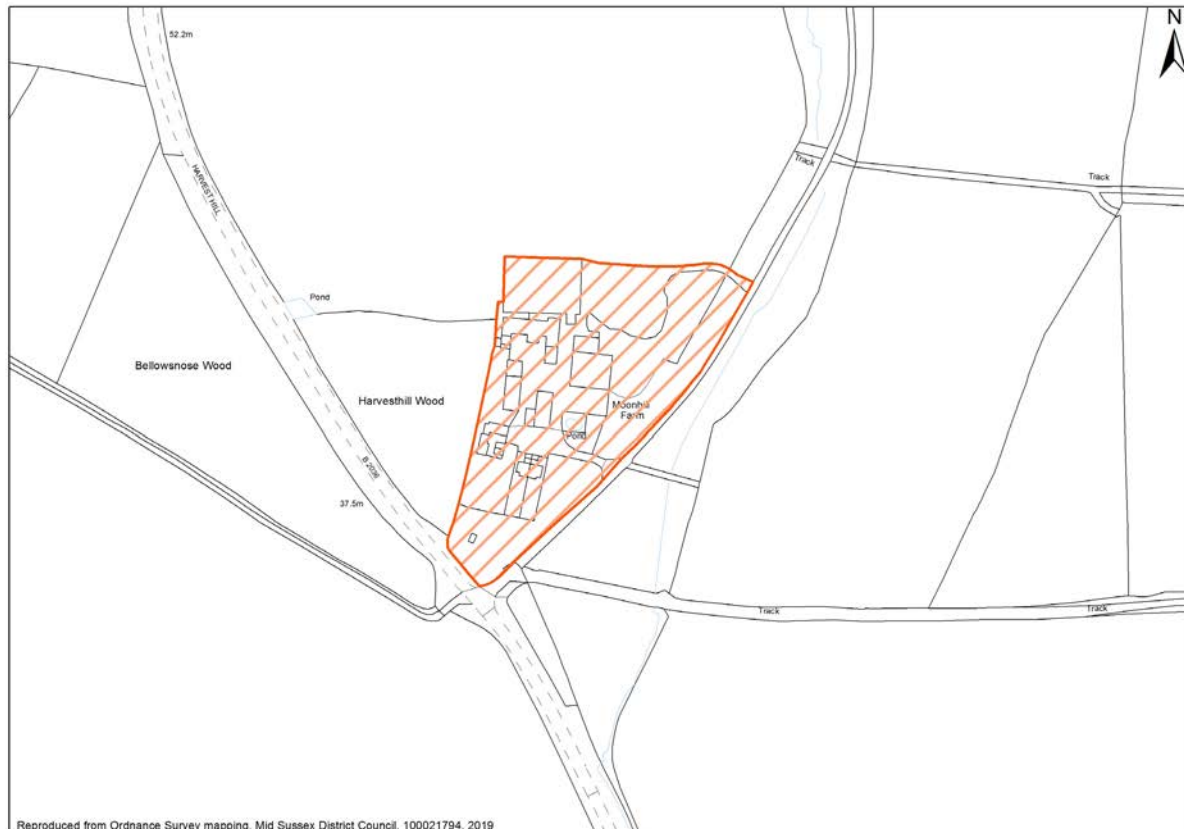
950

Settlement:

Burgess Hill

Gross Site Area (ha):

1.46



Sussex House, Civic Way, Burgess Hill

SHELAA:

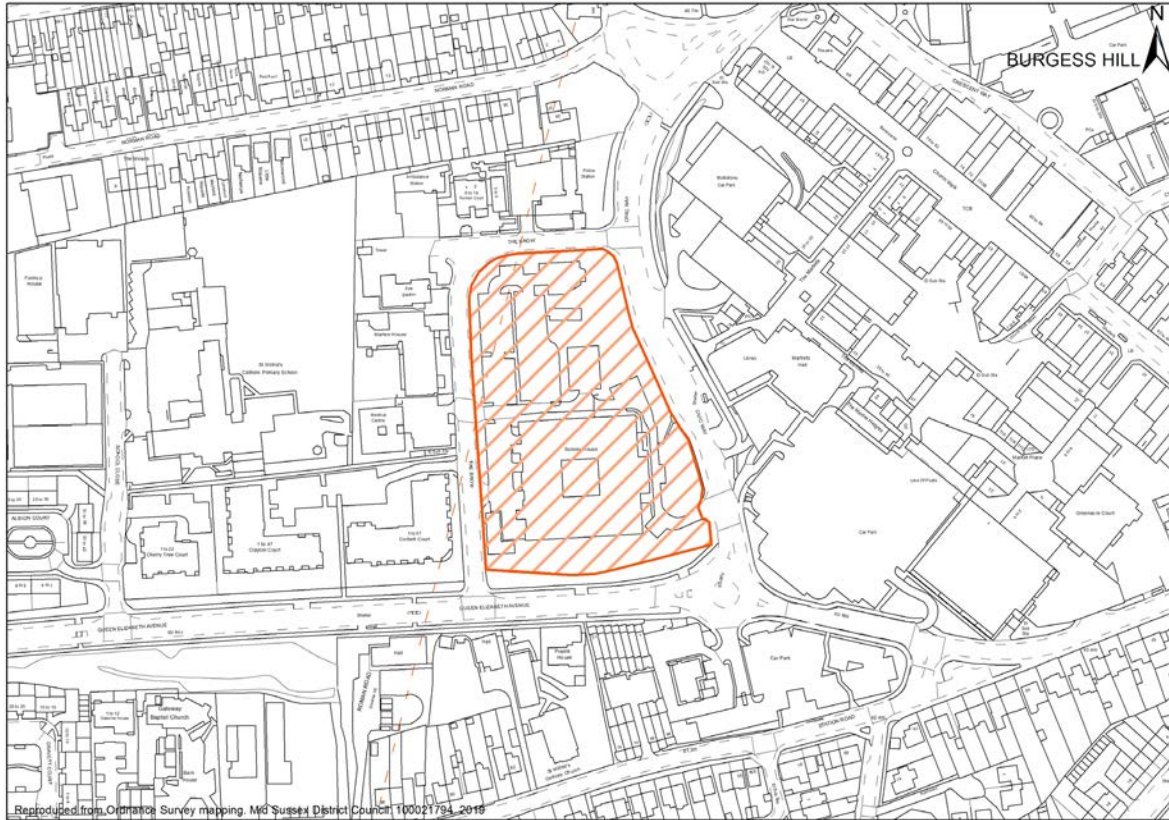
866

Settlement:

Burgess Hill

Gross Site Area (ha):

1.6



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

SHELAA:

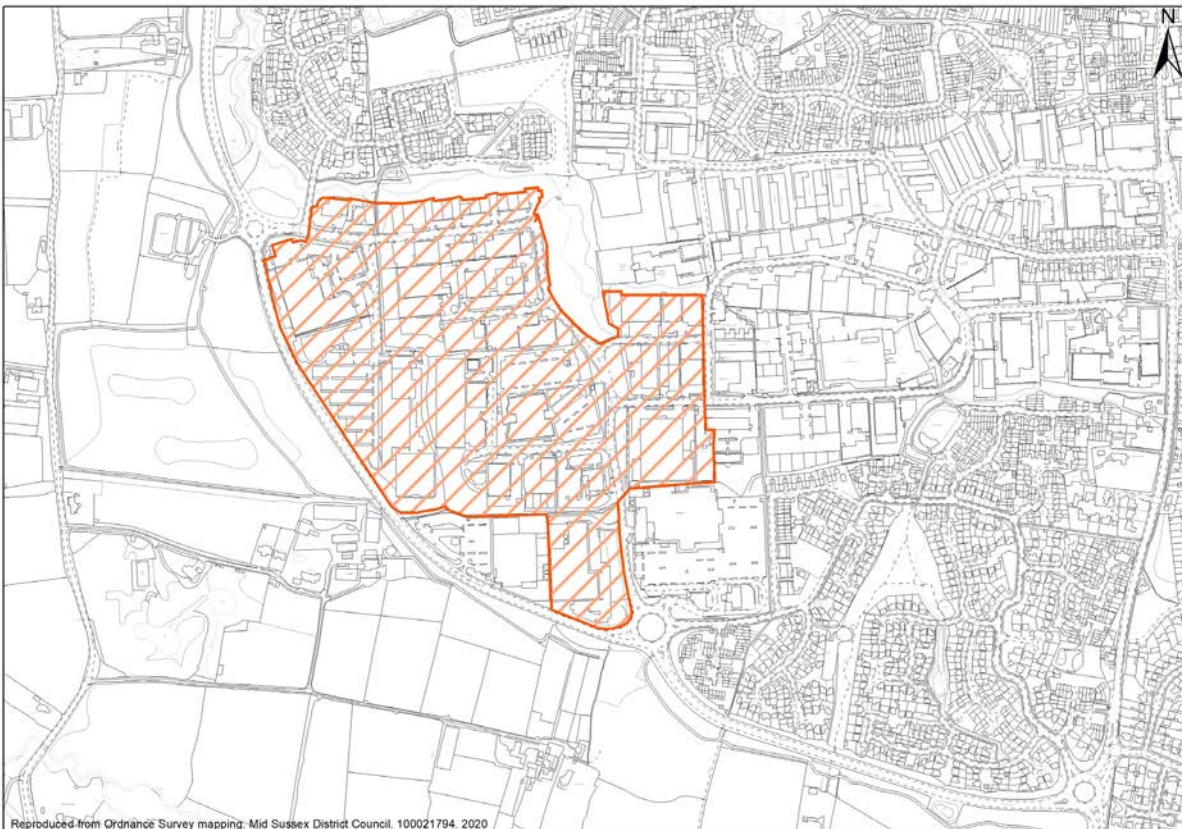
910

Settlement:

Burgess Hill

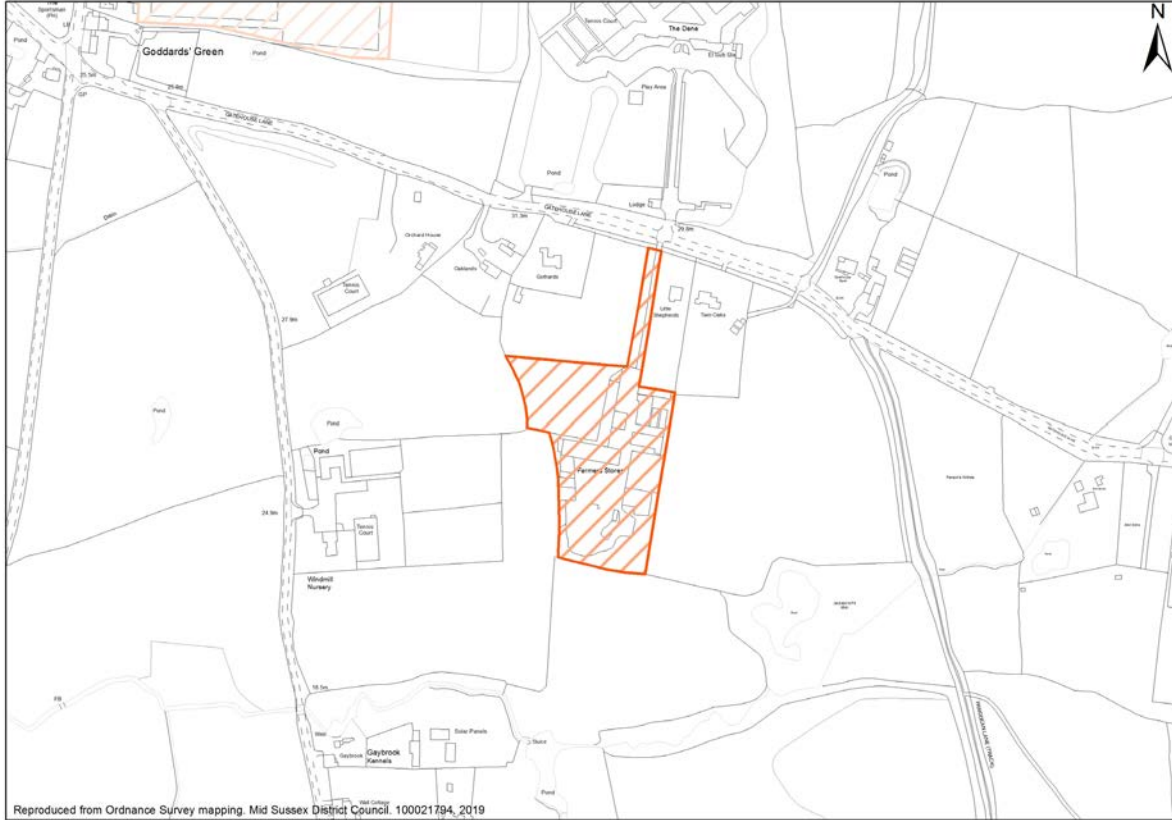
Gross Site Area (ha):

21.3



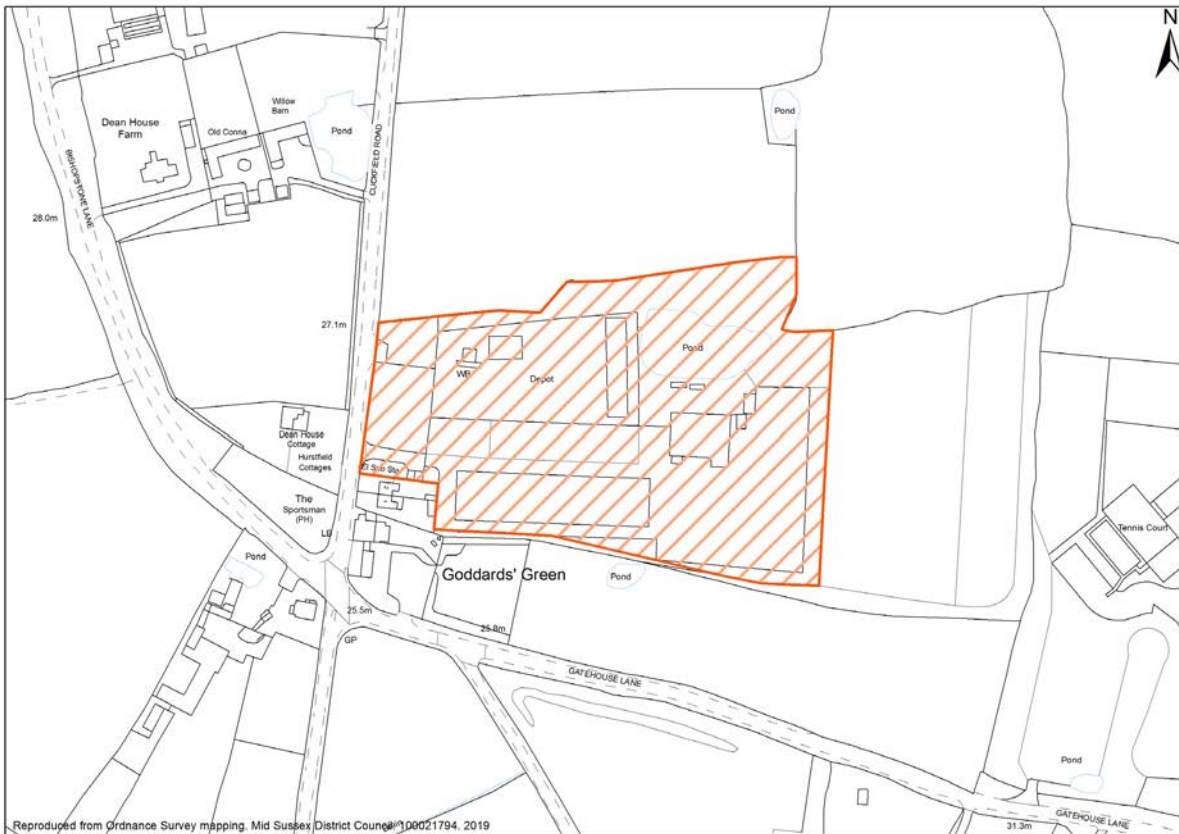
Farmers Stores, Gatehouse Lane, Burgess Hill

SHELAA: 951 Settlement: Burgess Hill Gross Site Area (ha): 1.04



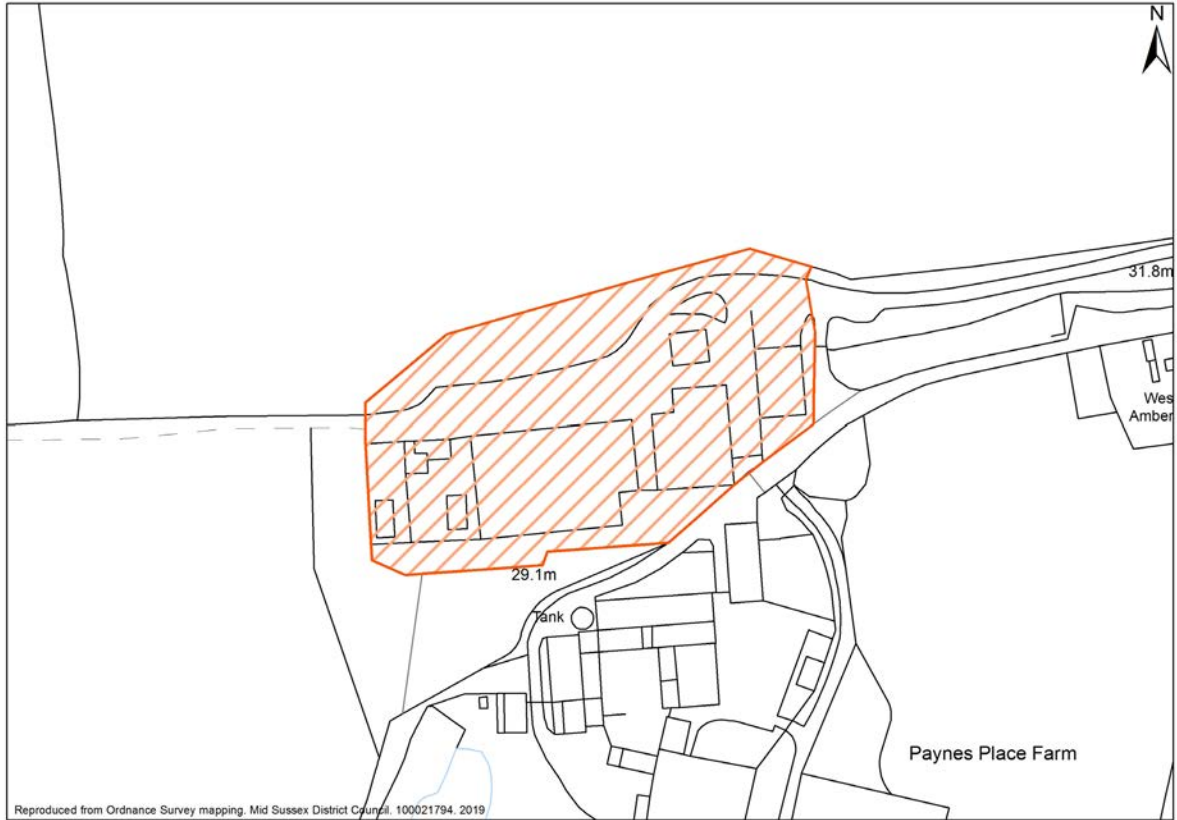
Depot, Cuckfield Road, Goddards Green

SHELAA: 908 Settlement: Burgess Hill Gross Site Area (ha): 3



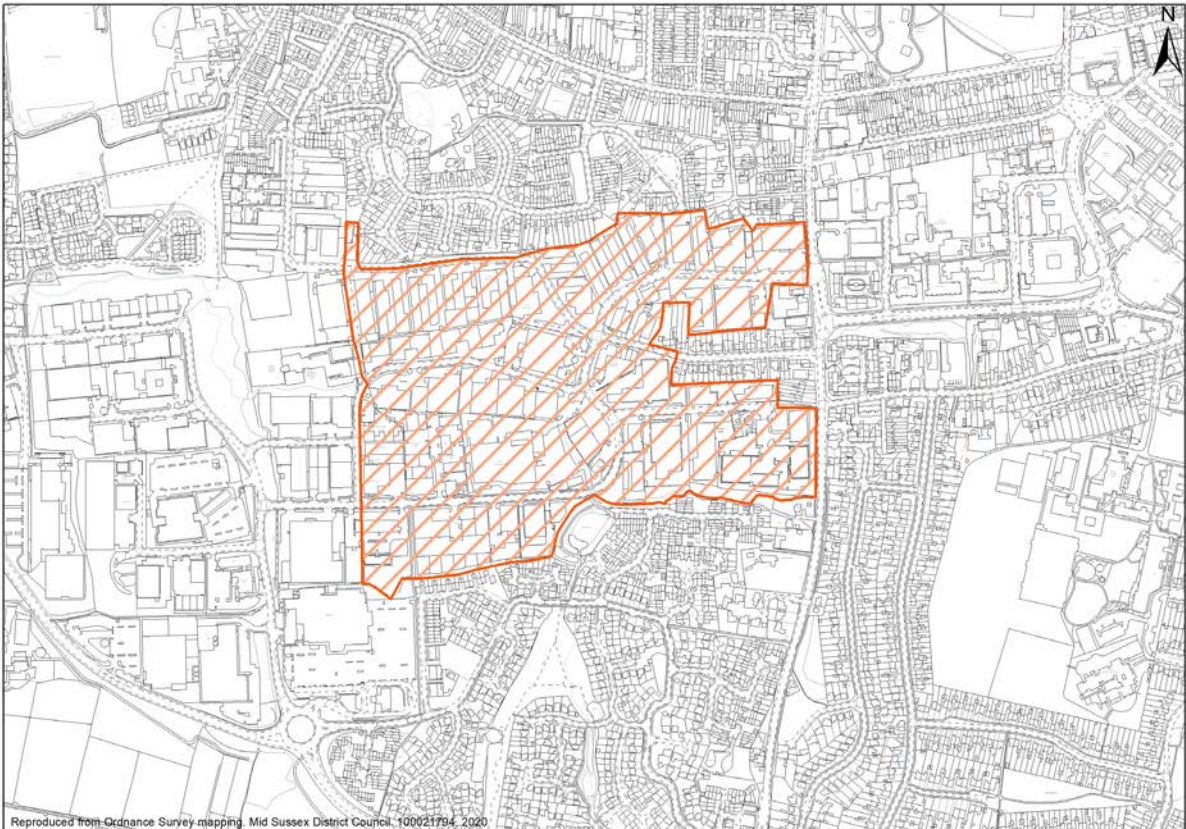
Paynes Place Farm, Burgess Hill

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



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

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



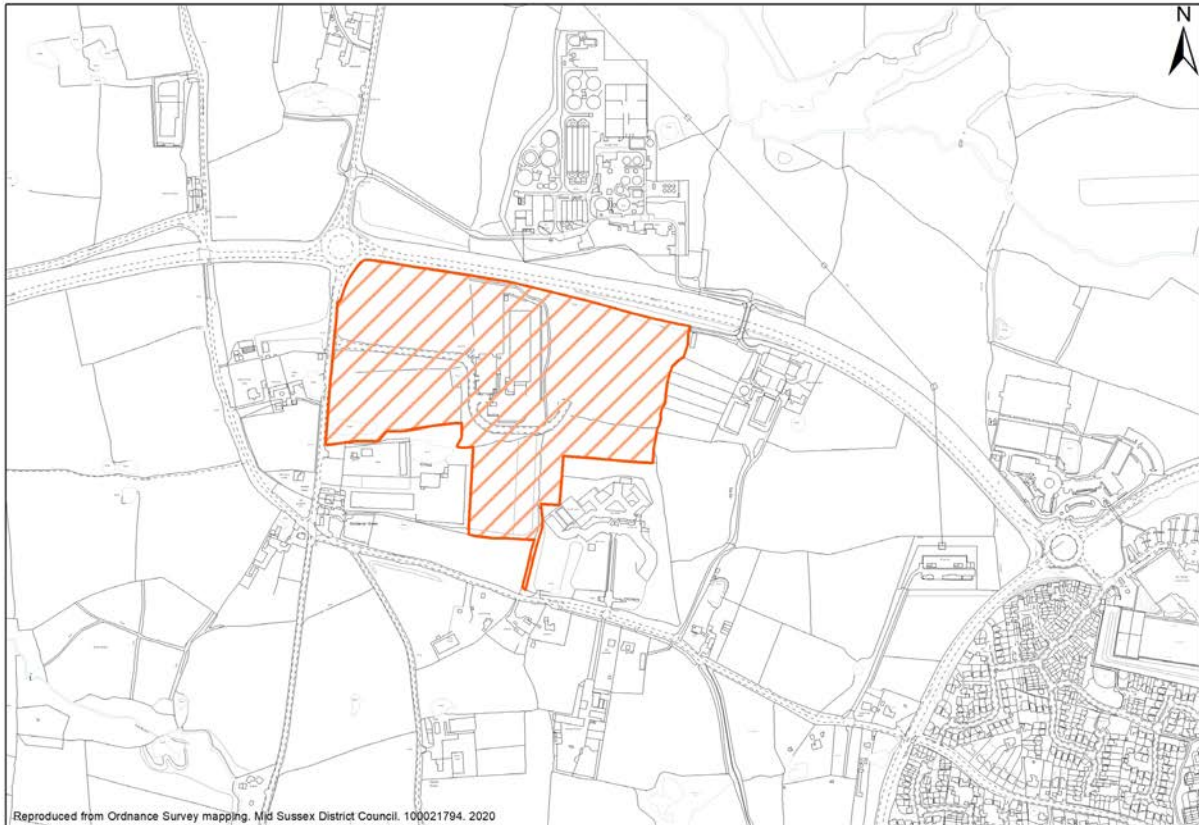
The Hub, Burgess Hill

SHELAA: 74

Settlement: Burgess Hill

Gross Site Area (ha):

14



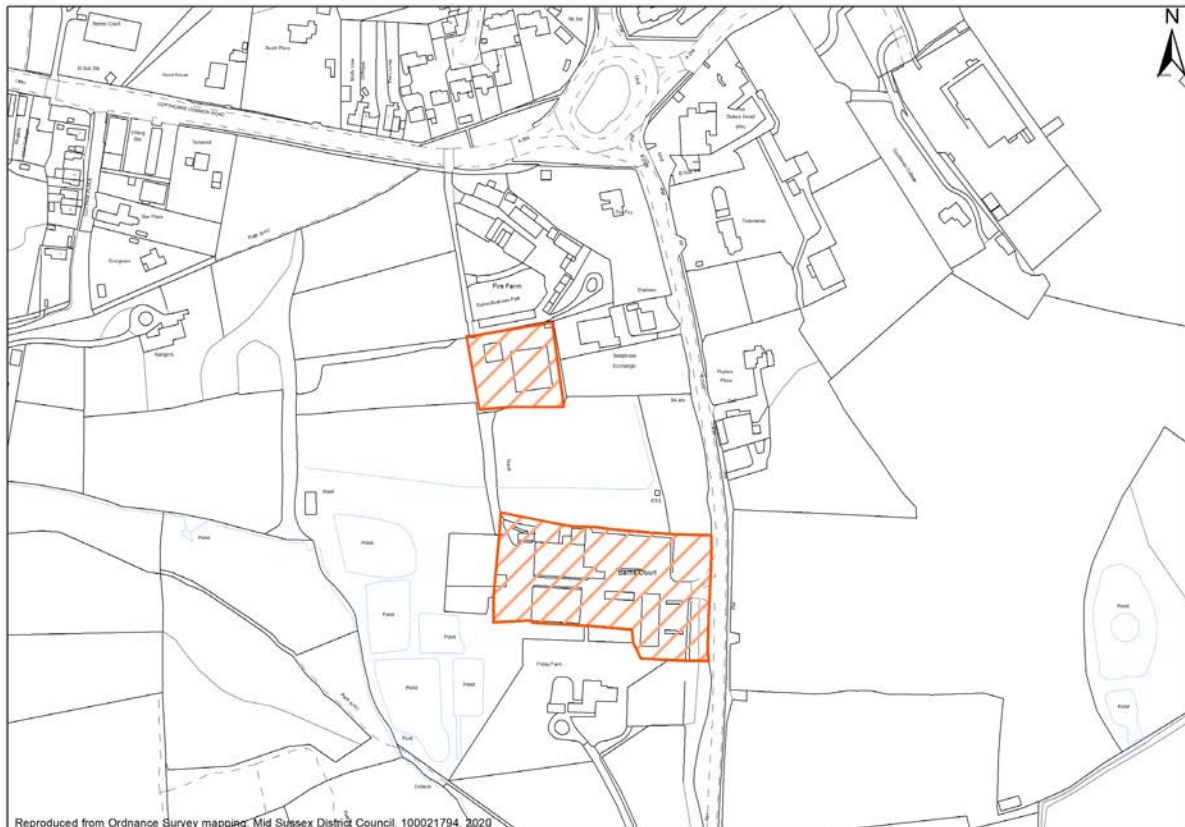
Barns Court and Firs Farm, Turners Hill Road, Copthorne

SHELAA: 914

Settlement: Copthorne

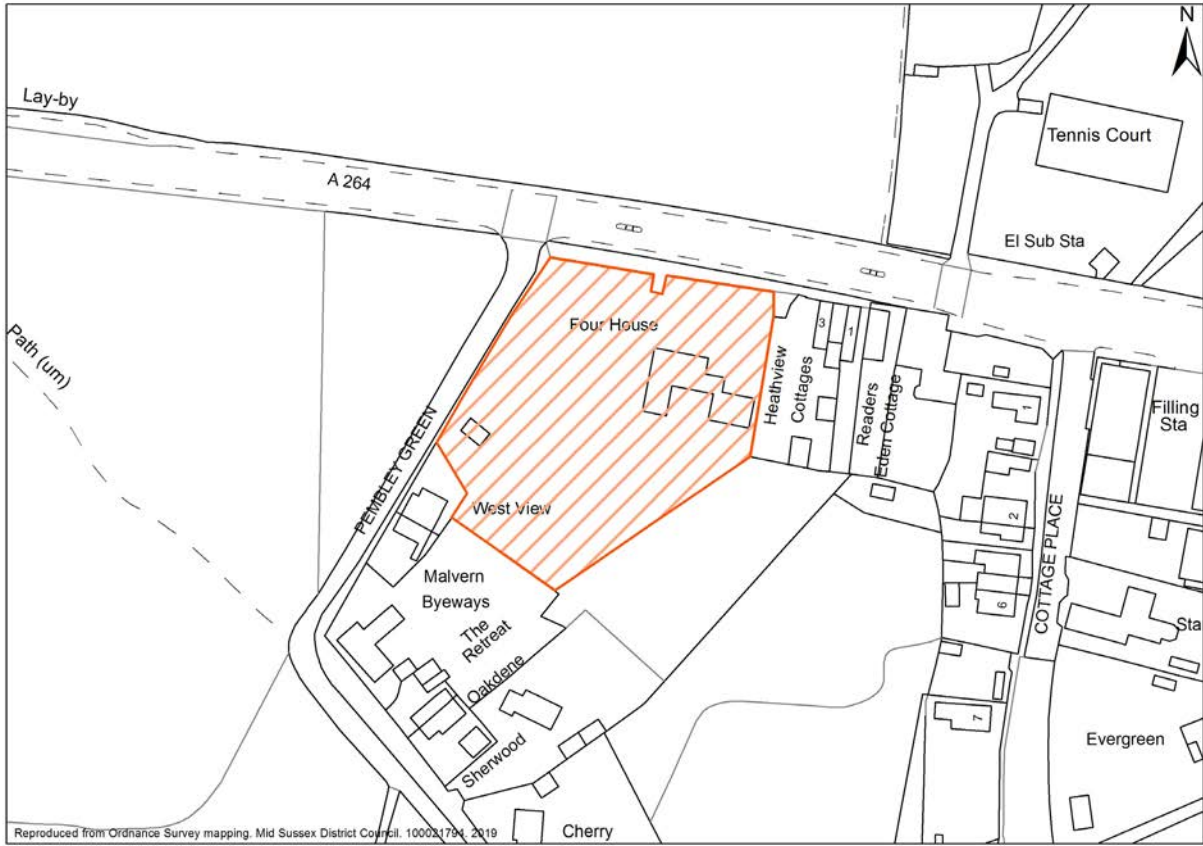
Gross Site Area (ha):

1.8



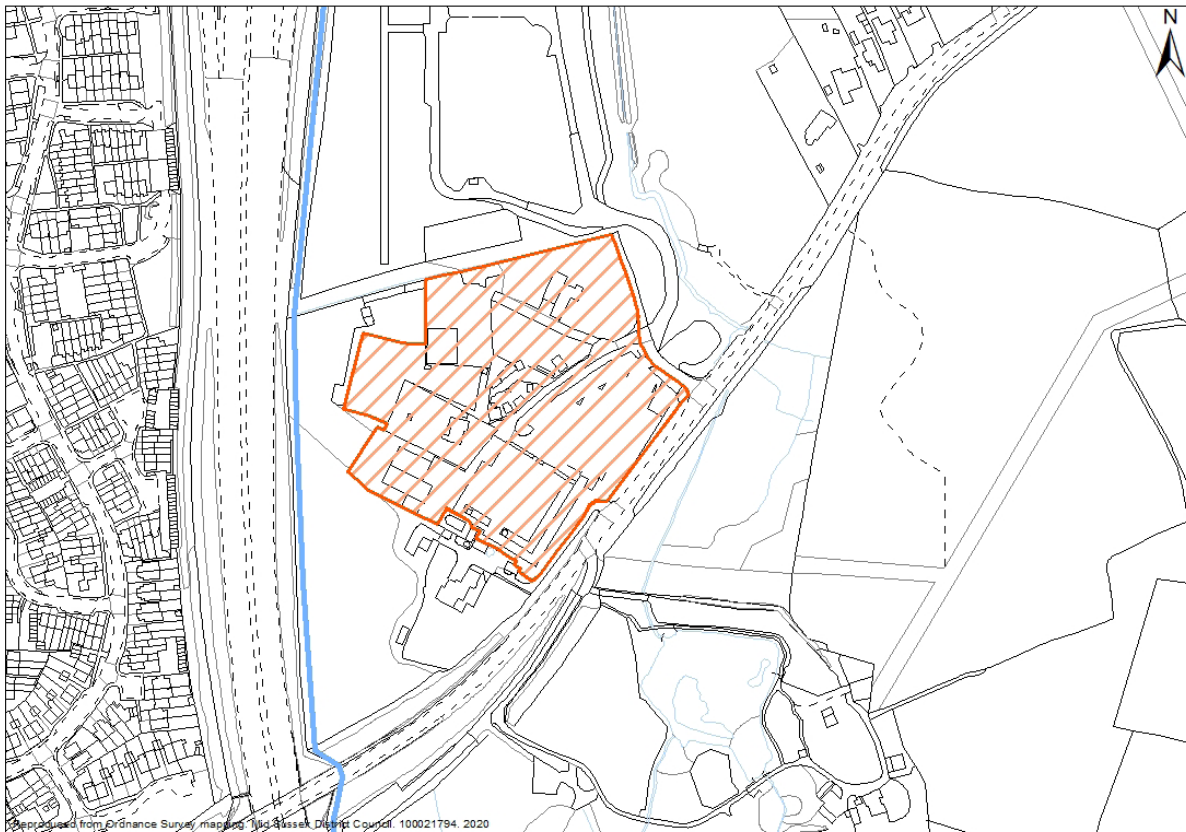
Mint House (Four House), Copthorne Common Road, Copthorne

SHELAA: 413 Settlement: Copthorne Gross Site Area (ha): 0.43



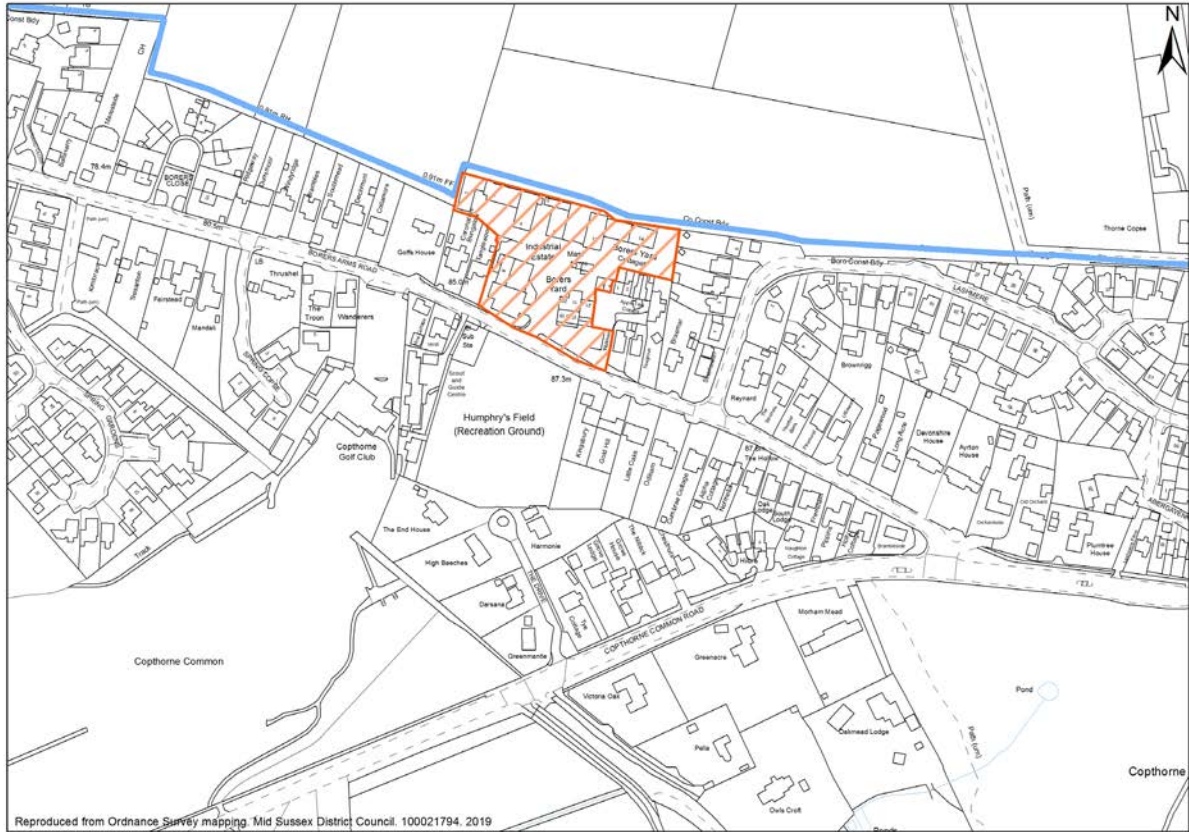
Crawley Garden Centre, Copthorne Road A2220

SHELAA: 604 Settlement: Copthorne Gross Site Area (ha): 2.5



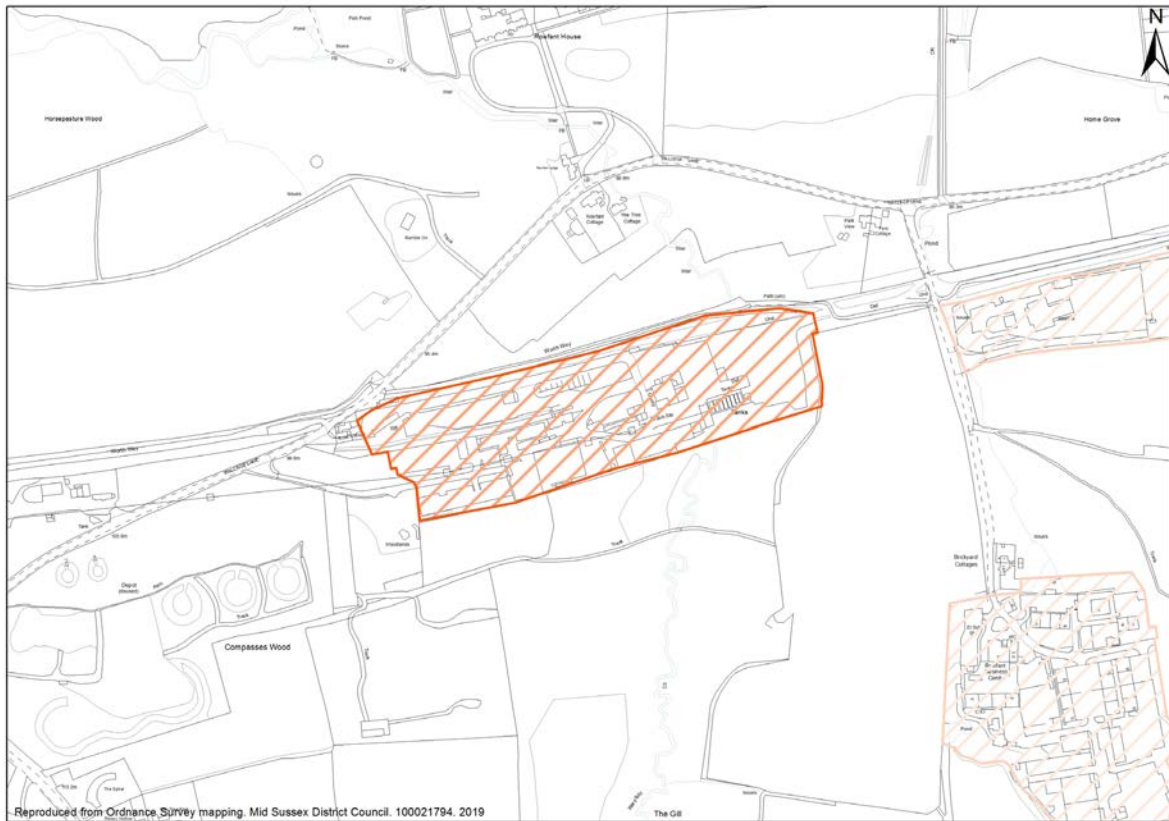
Borers Yard, Borers Arms Road, Cophorne

SHELAA: 890 Settlement: Cophorne Gross Site Area (ha): 0.80



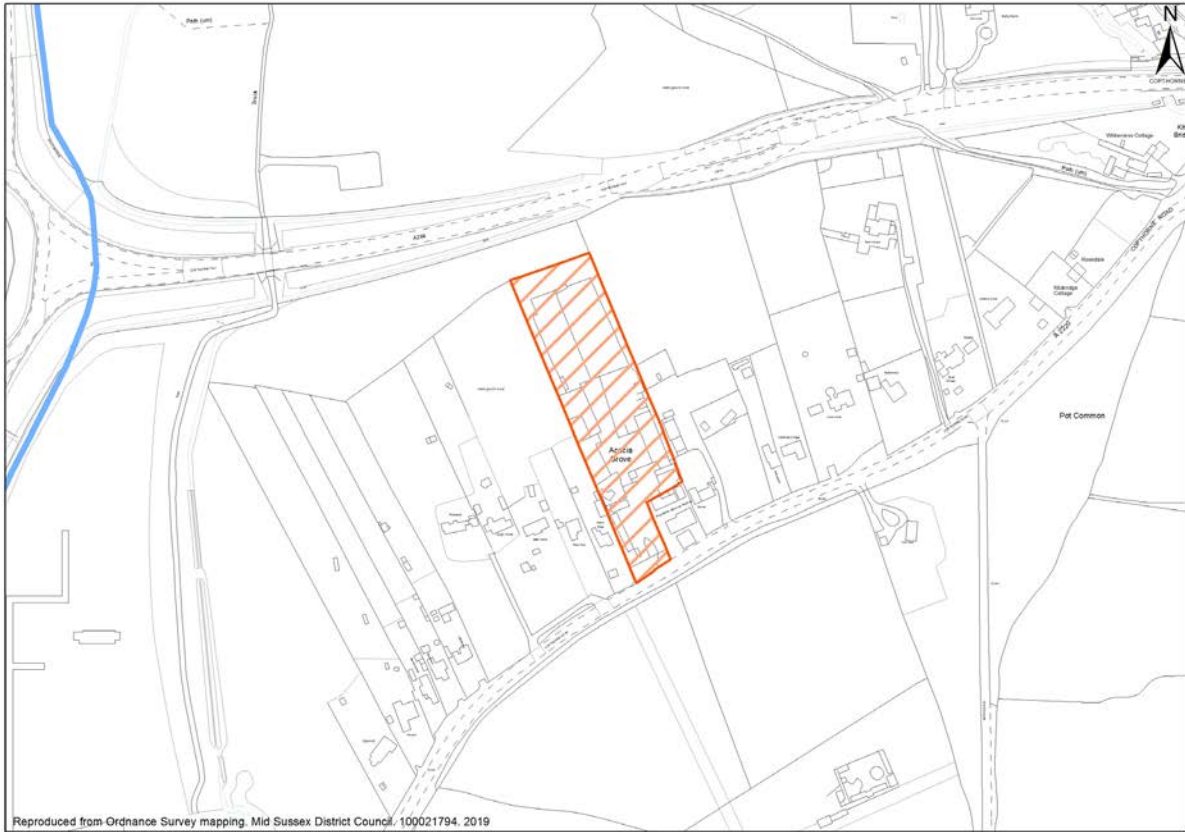
Colas, Wallage Lane, Rowfant

SHELAA: 892 Settlement: Cophorne Gross Site Area (ha): 4.5



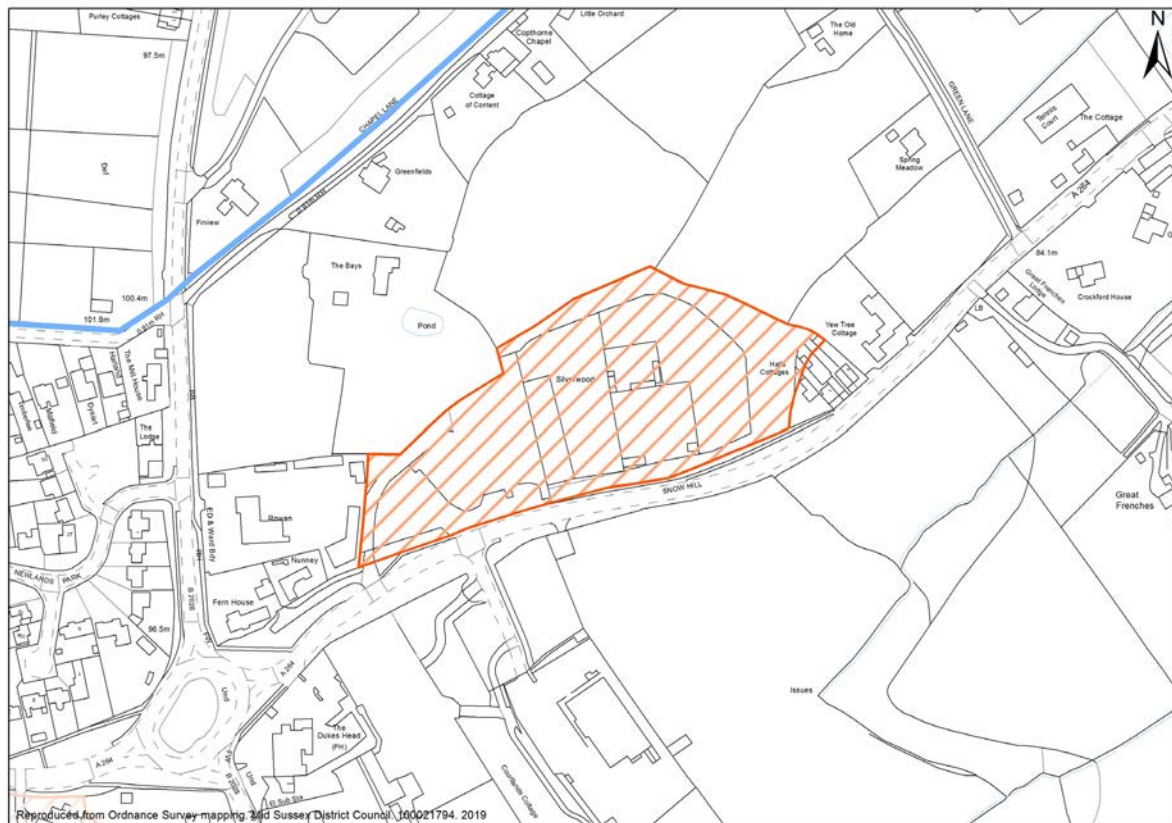
Acacia Grove, Copthorne Road, Copthorne

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



Land at Silverwood, Snowhill, Crawley Down

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



Mill Place Farm, Vowels Lane, East Grinstead

SHELAA:

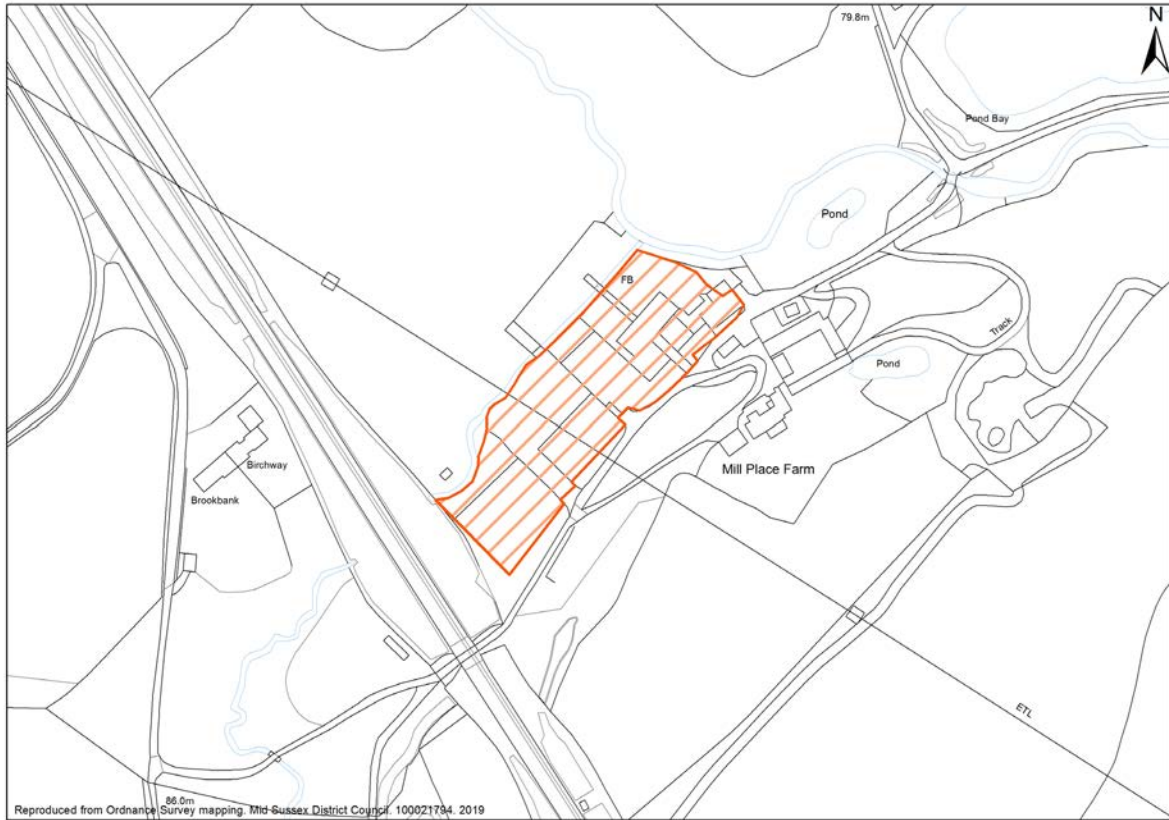
874

Settlement:

East Grinstead

Gross Site Area (ha):

0.74



High Grove, Imberhorne Lane, East Grinstead

SHELAA:

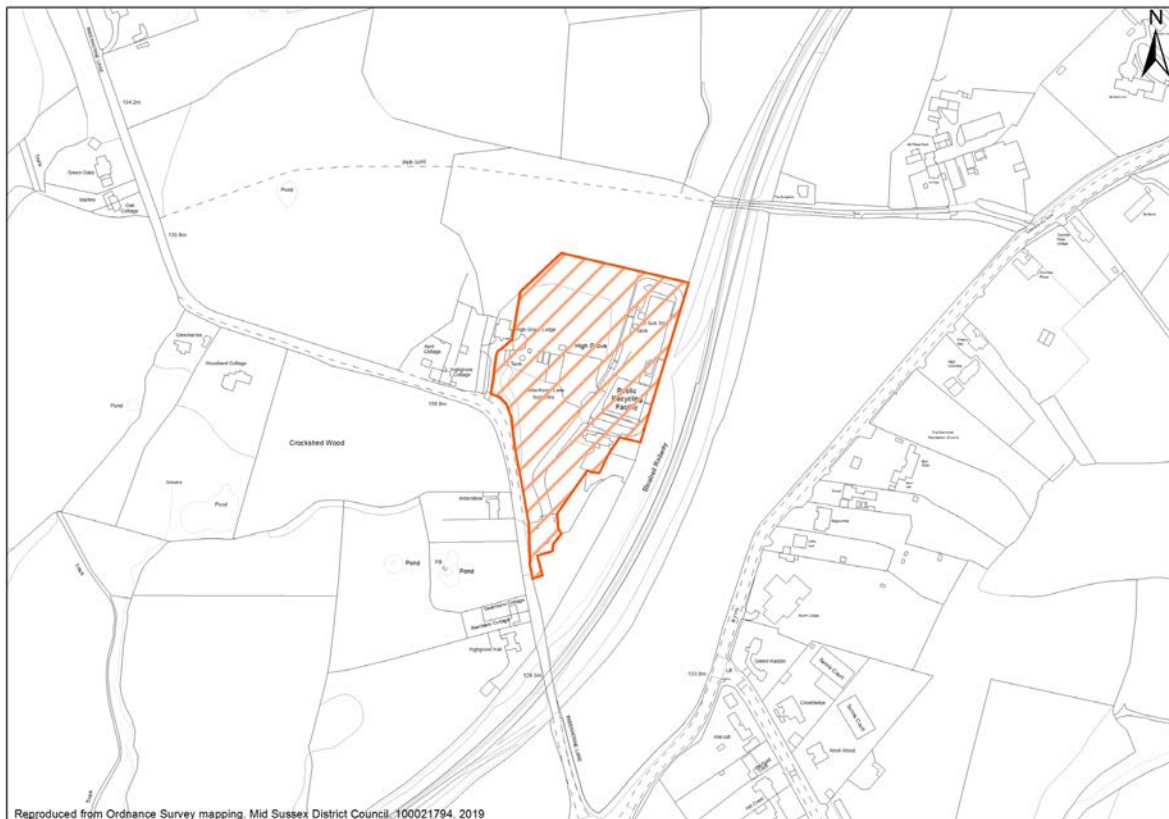
867

Settlement:

East Grinstead

Gross Site Area (ha):

2.3



Felbridge Centre, Birches Industrial Estate, East Grinstead

SHELAA:

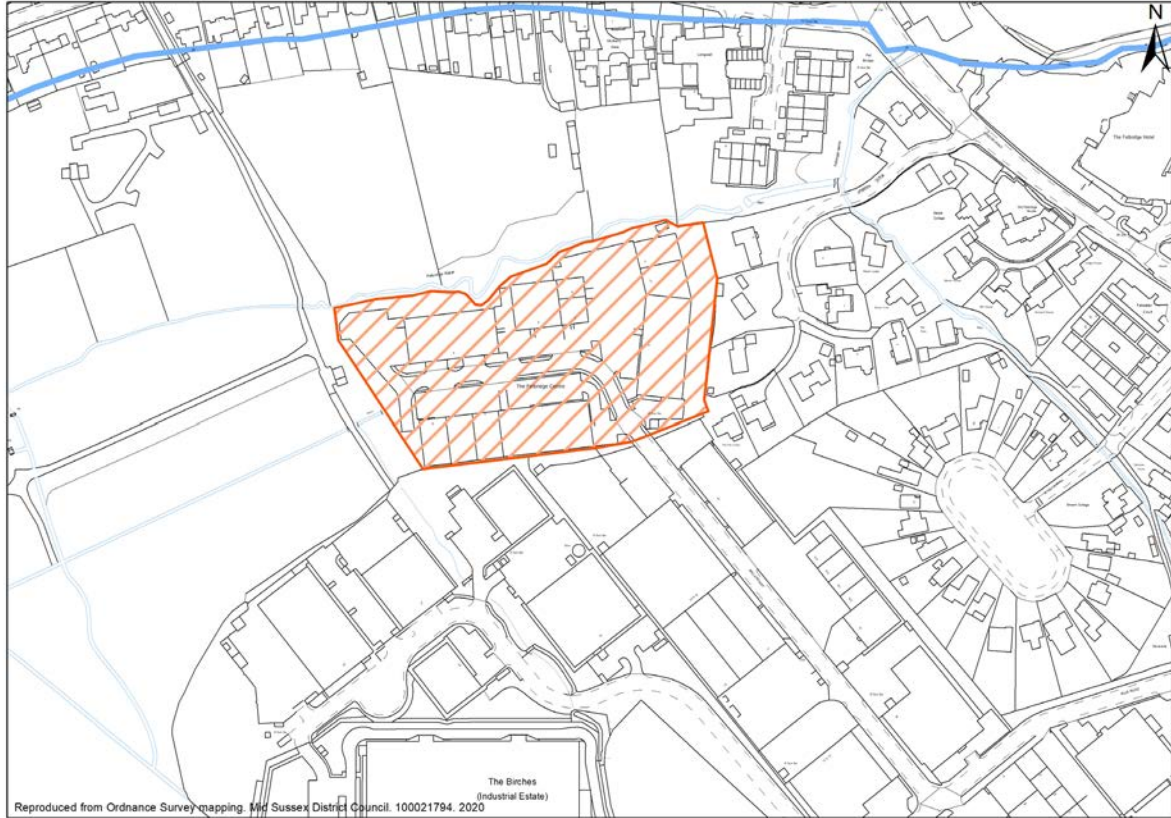
869

Settlement:

East Grinstead

Gross Site Area (ha):

2



Imberhorne Way, East Grinstead

SHELAA:

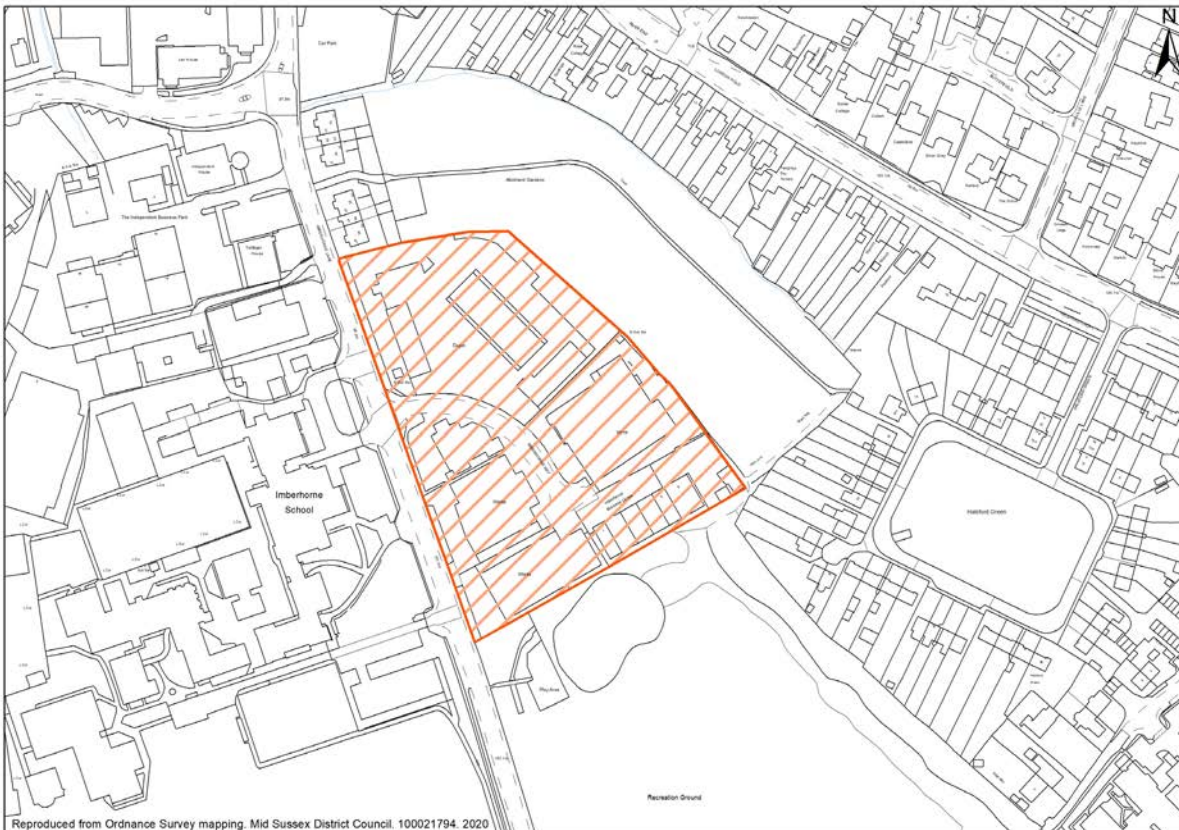
870

Settlement:

East Grinstead

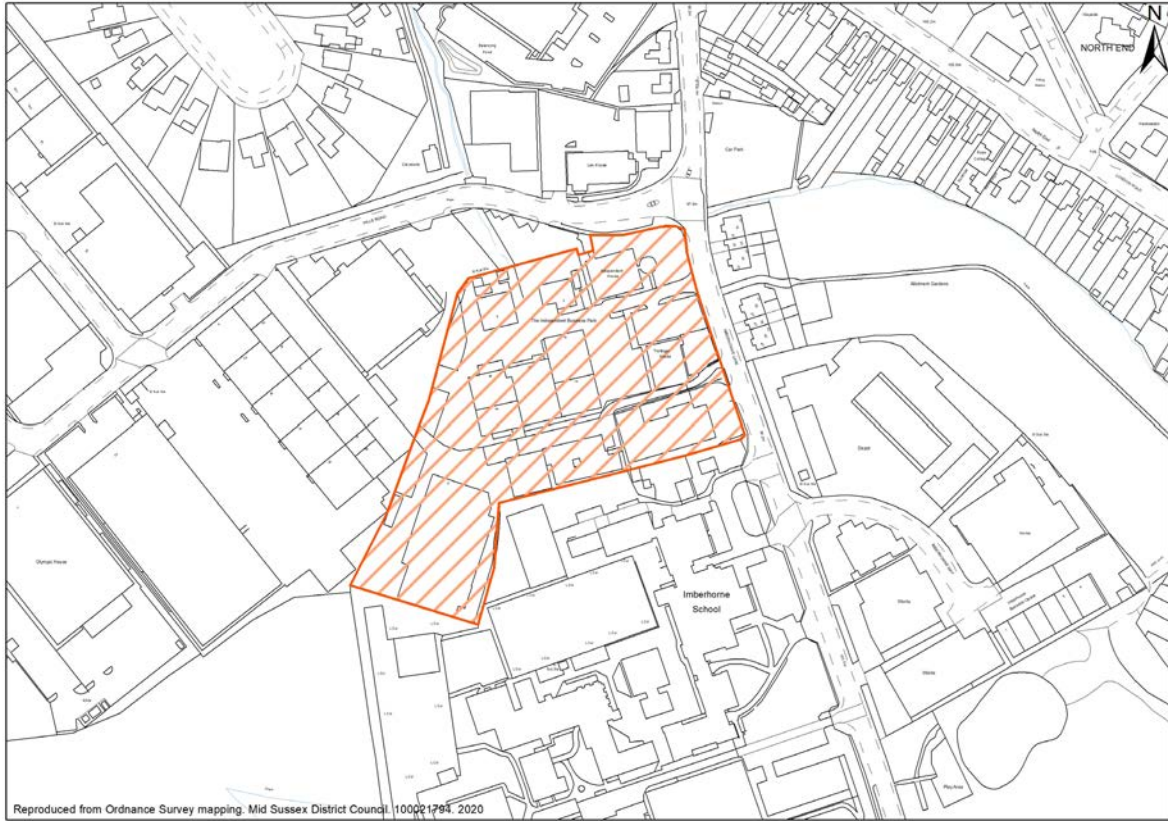
Gross Site Area (ha):

1.9



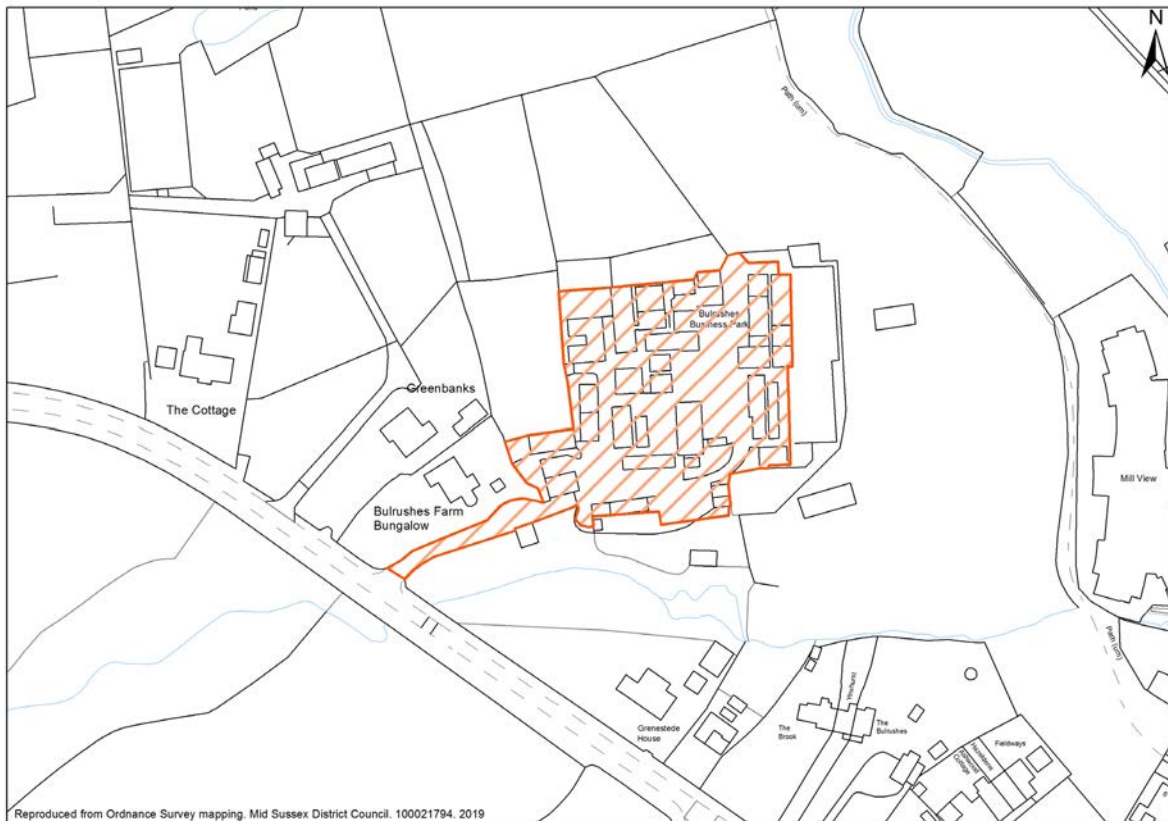
Independent Business Park, Imberhorne Lane, East Grinstead

SHELAA: 871 Settlement: East Grinstead Gross Site Area (ha): 1.7



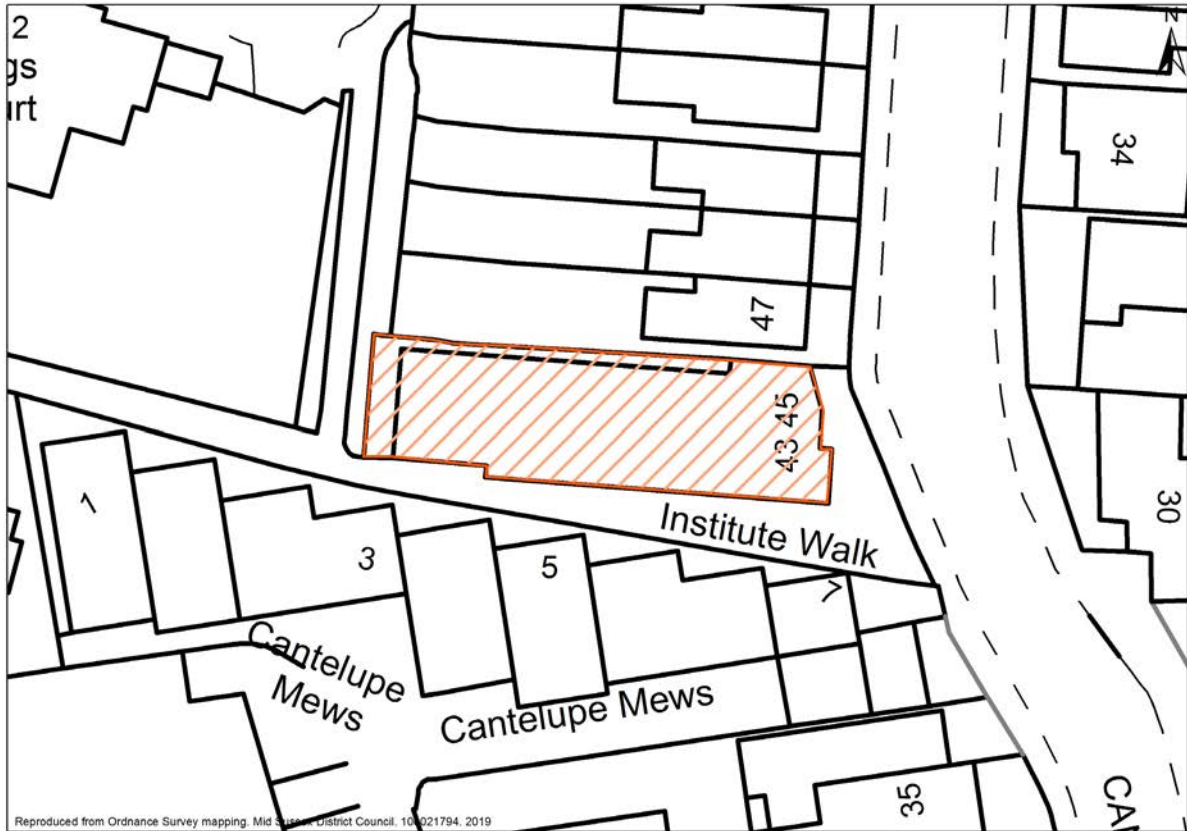
Bulrushes Business Park, Coombe Hill Road, East Grinstead

SHELAA: 873 Settlement: East Grinstead Gross Site Area (ha): 0.63



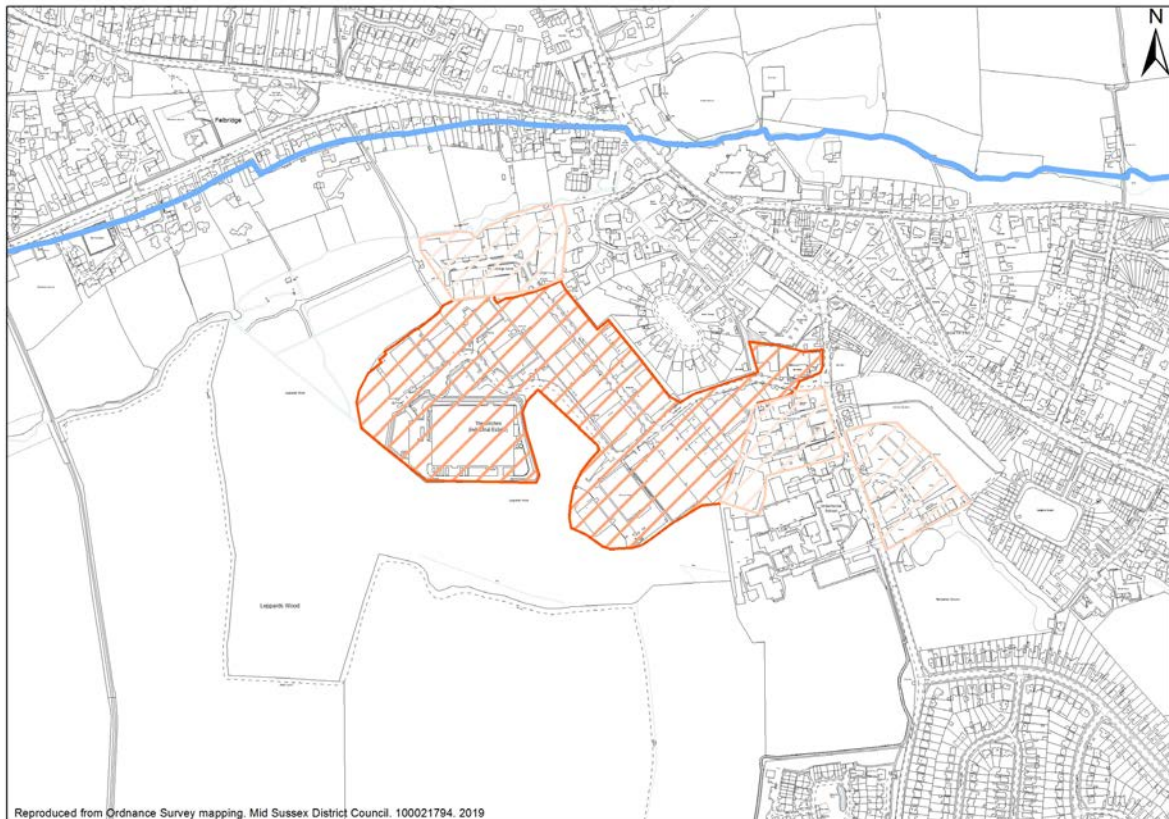
43-45 Cantelupe Road, East Grinstead

SHELAA: 414 Settlement: East Grinstead Gross Site Area (ha): 0.03



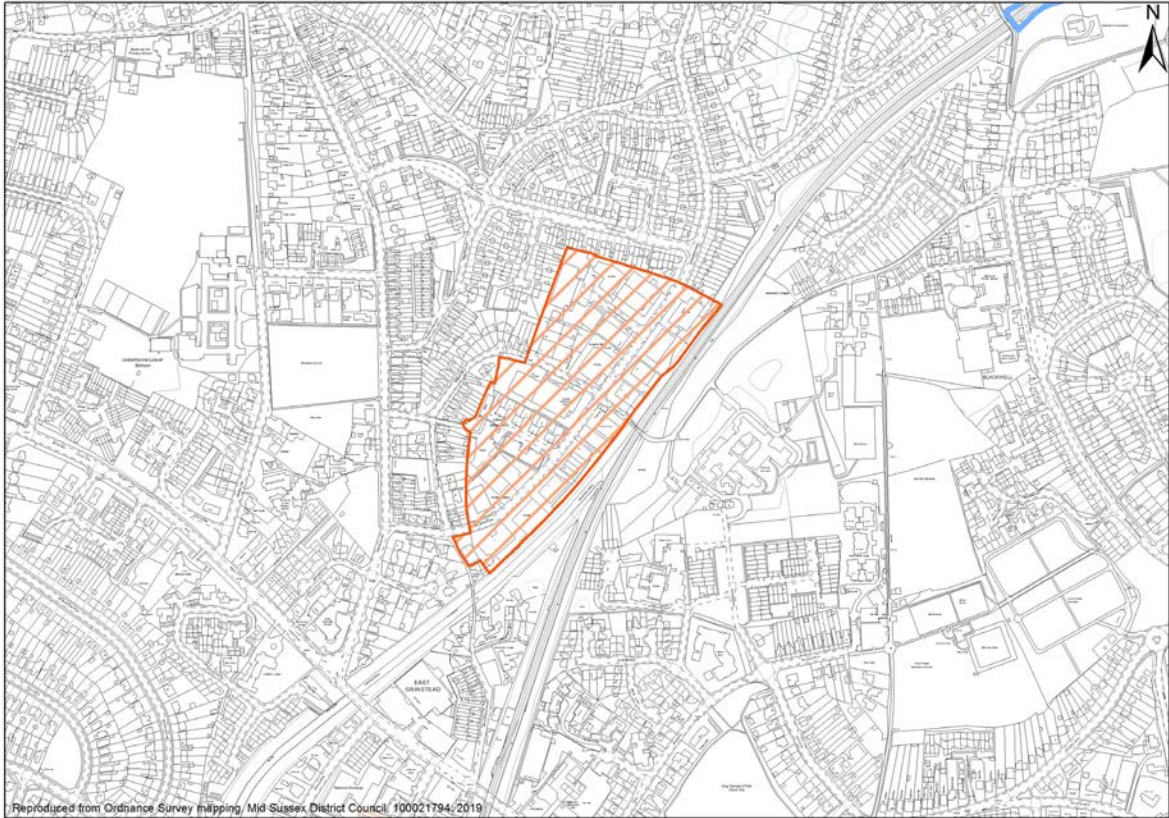
Birches Industrial Estate, East Grinstead

SHELAA: 868 Settlement: East Grinstead Gross Site Area (ha): 13.2



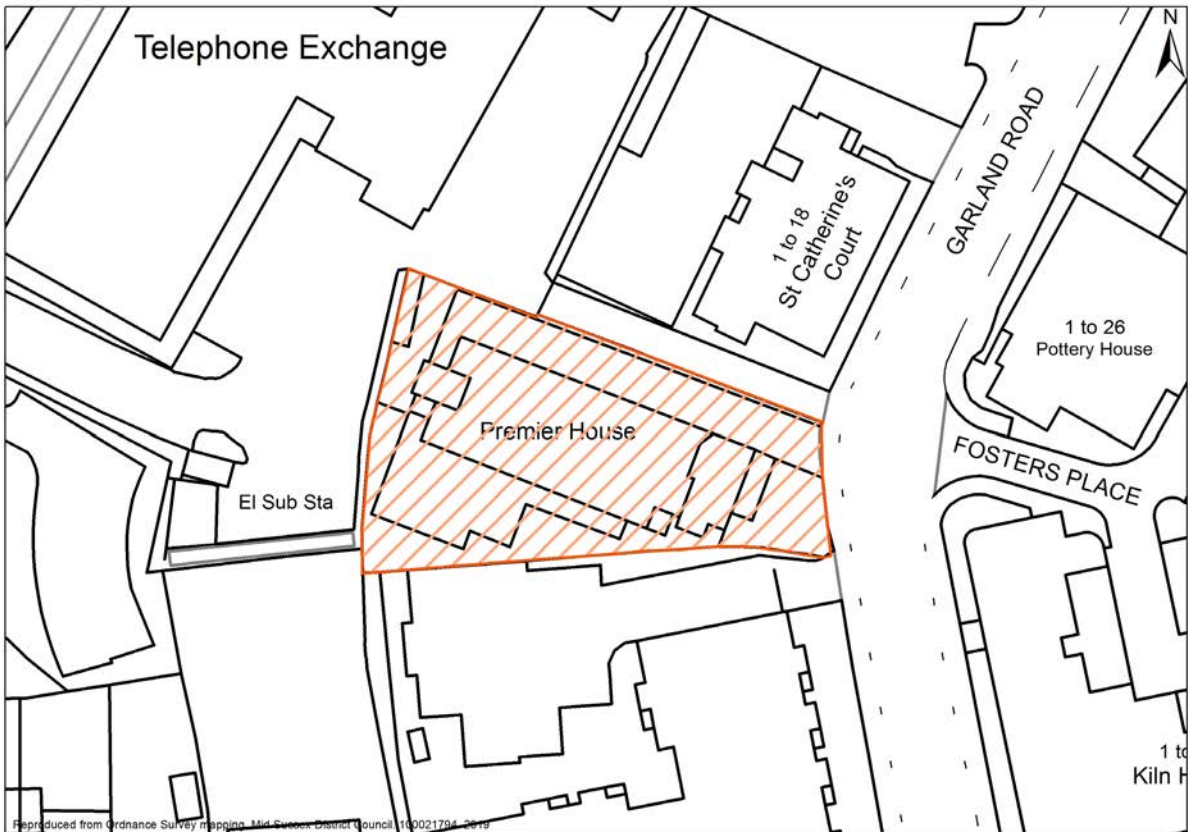
Charlwoods Industrial Estate, East Grinstead

SHELAA: 222 Settlement: East Grinstead Gross Site Area (ha): 5.7



Premier House, Garland Road, East Grinstead

SHELAA: 323 Settlement: East Grinstead Gross Site Area (ha): 0.12



Former Handcross Garden Centre, Handcross

SHELAA:

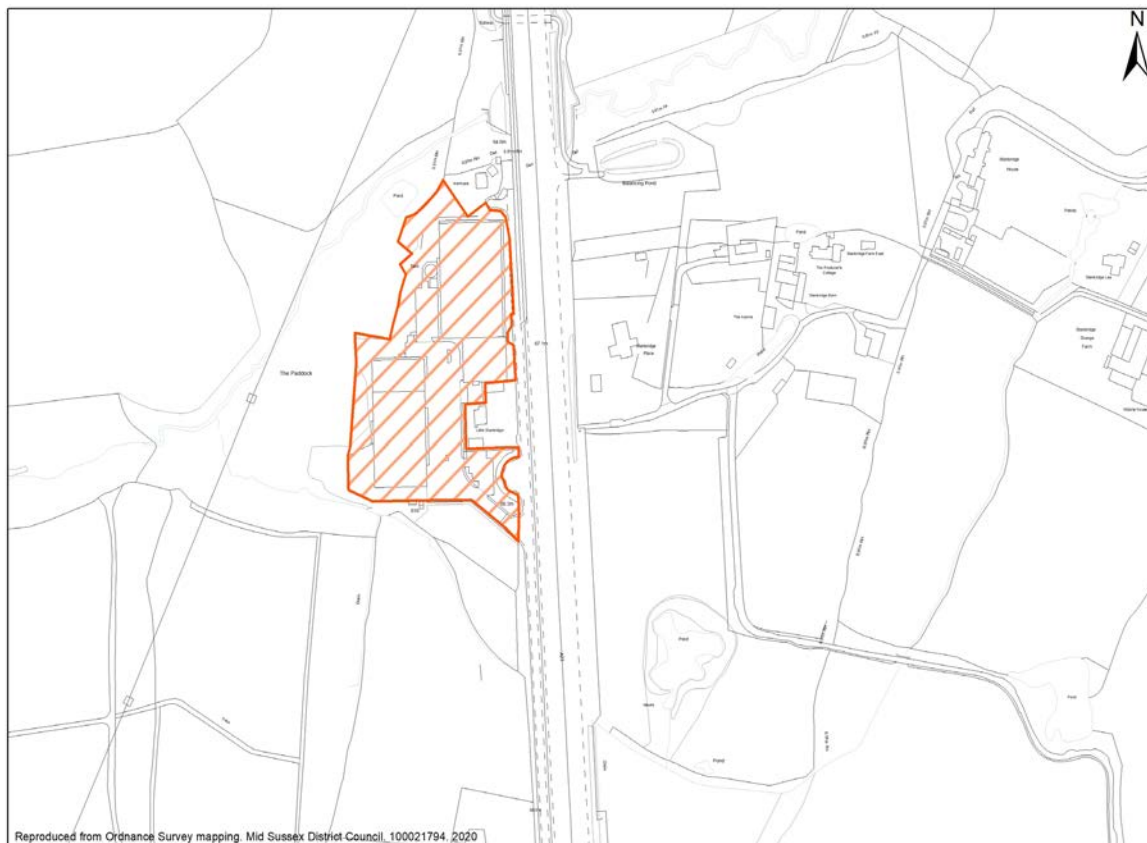
605

Settlement:

Handcross

Gross Site Area (ha):

2.6



Tates (South Downs Garden Centre), Brighton Road, Hassocks

SHELAA:

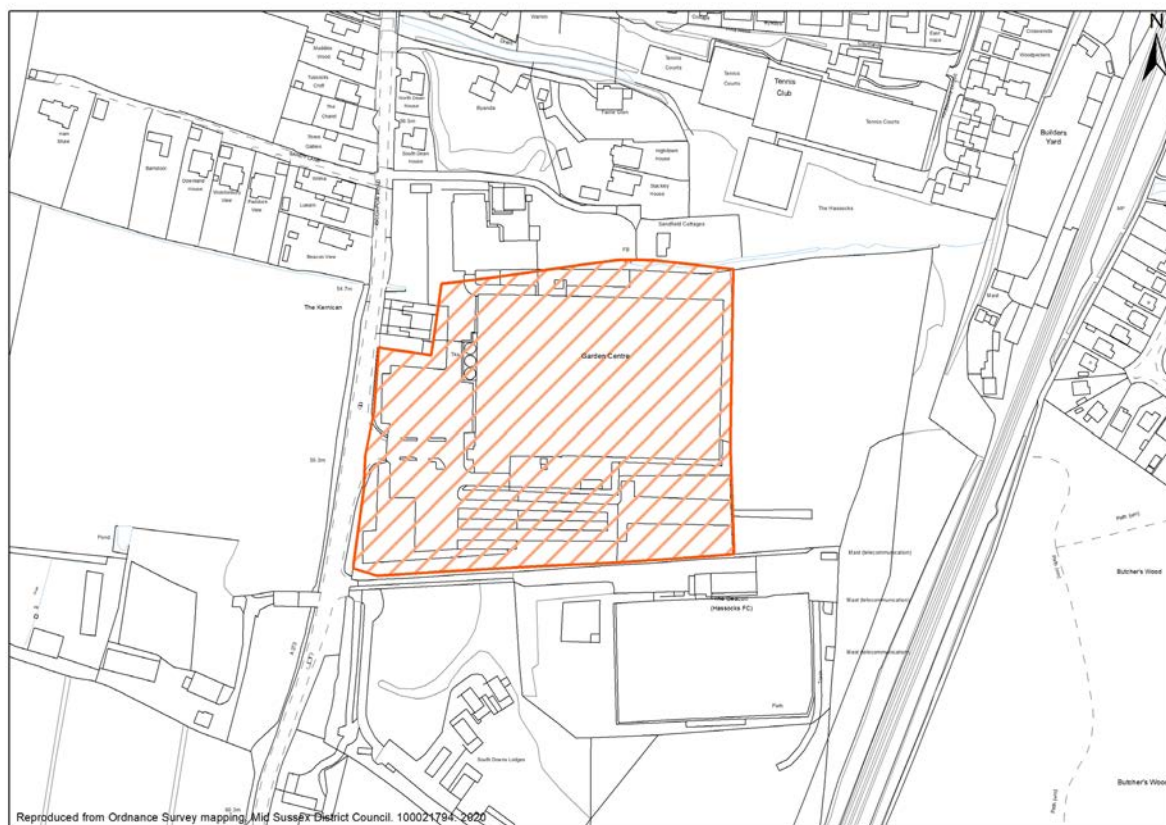
171

Settlement:

Hassocks

Gross Site Area (ha):

3.4



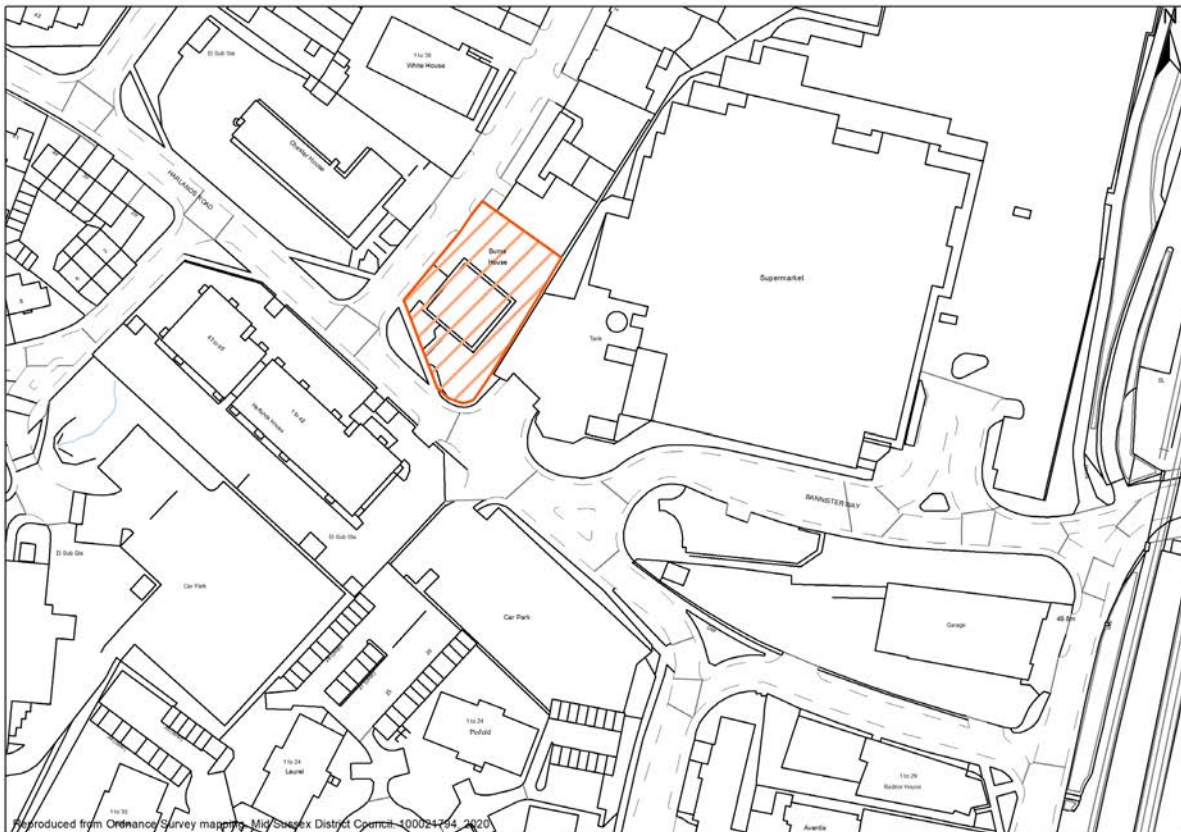
Concord House, Balcombe Road, Haywards Heath

SHELAA: 353 Settlement: Haywards Heath Gross Site Area (ha): 0.11



Burns House, Harlands Road, Haywards Heath

SHELAA: 708 Settlement: Haywards Heath Gross Site Area (ha): 0.13



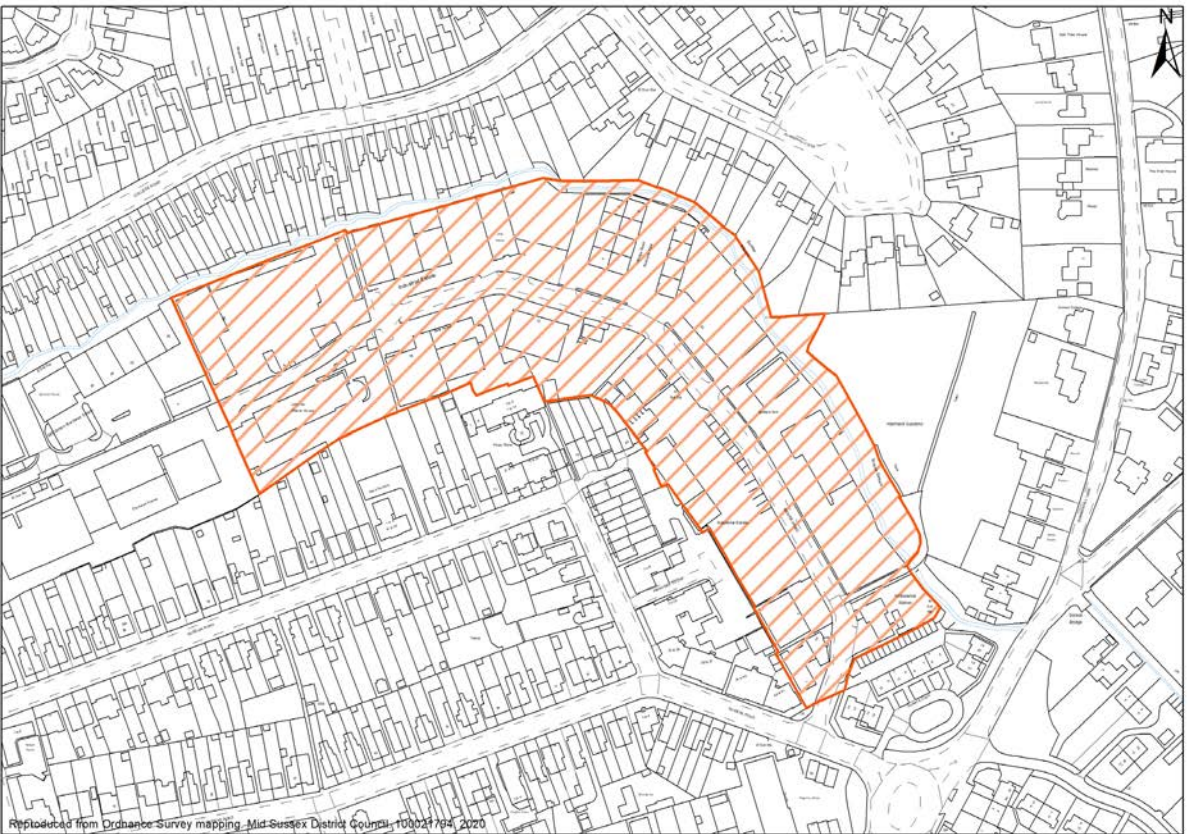
Mill Green Business Park, Haywards Heath

SHELAA: 938 Settlement: Haywards Heath Gross Site Area (ha): 1.5



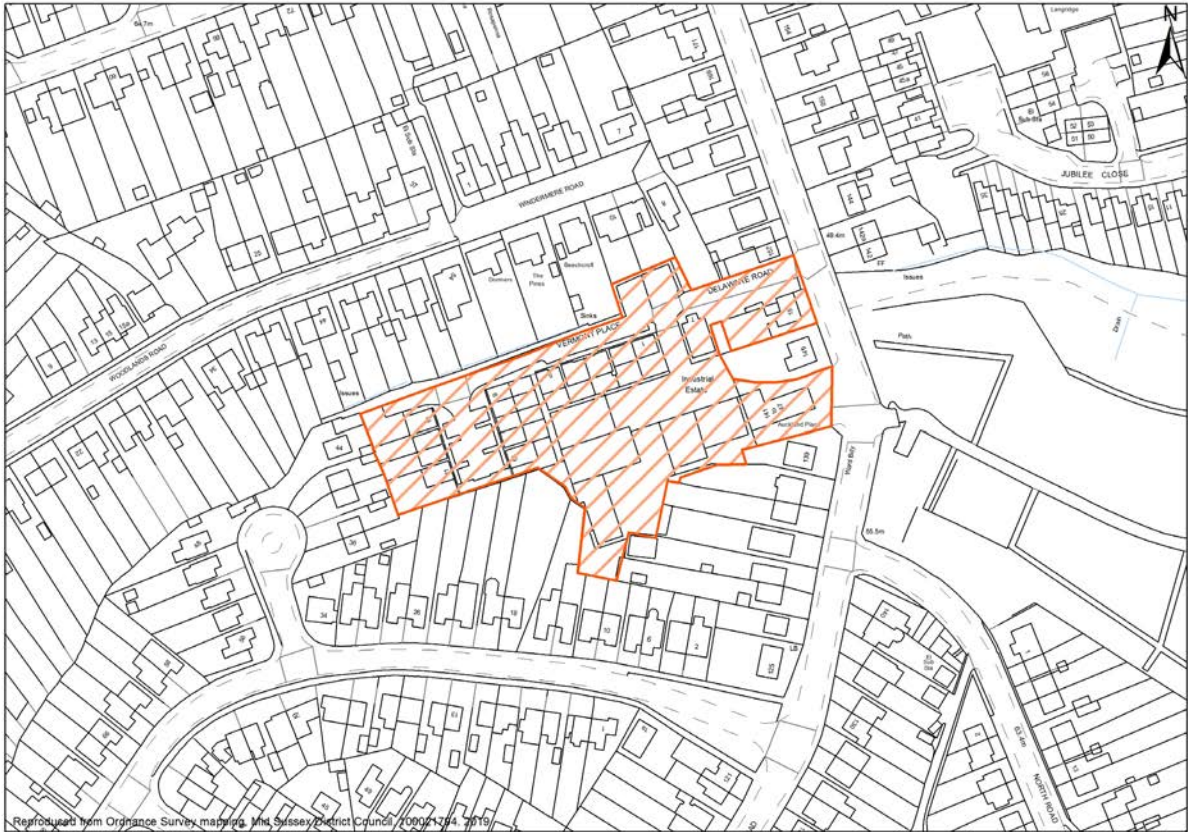
Bridge Road Industrial Estate, Haywards Heath

SHELAA: 935 Settlement: Haywards Heath Gross Site Area (ha): 3.98



Western Road Industrial Estate, Western Road, Haywards Heath

SHELAA: 877 Settlement: Haywards Heath Gross Site Area (ha): 0.8



Perrymount Road, Haywards Heath

SHELAA: 876 Settlement: Haywards Heath Gross Site Area (ha): 1.9



Burrell Road Industrial Estate, Haywards Heath

SHELAA:

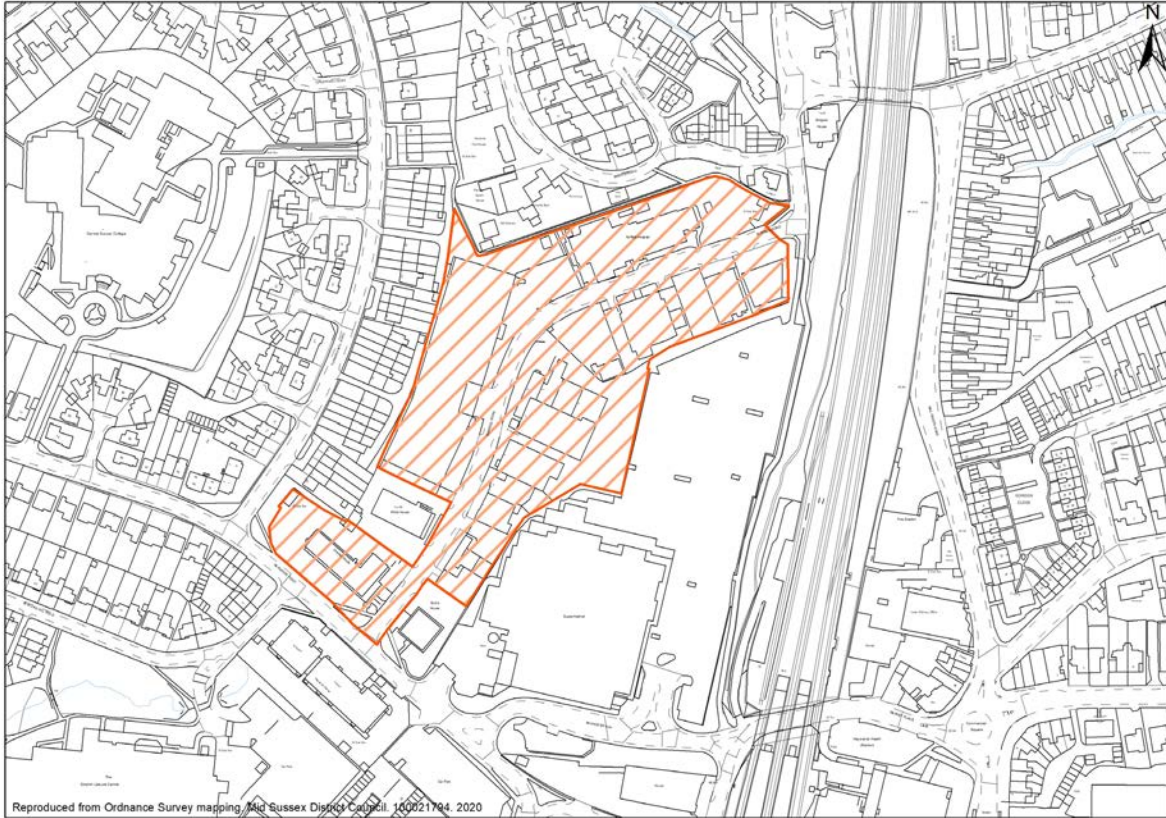
875

Settlement:

Haywards Heath

Gross Site Area (ha):

3.2



Freshfield Lane Brickworks, Freshfield Lane, Danehill

SHELAA:

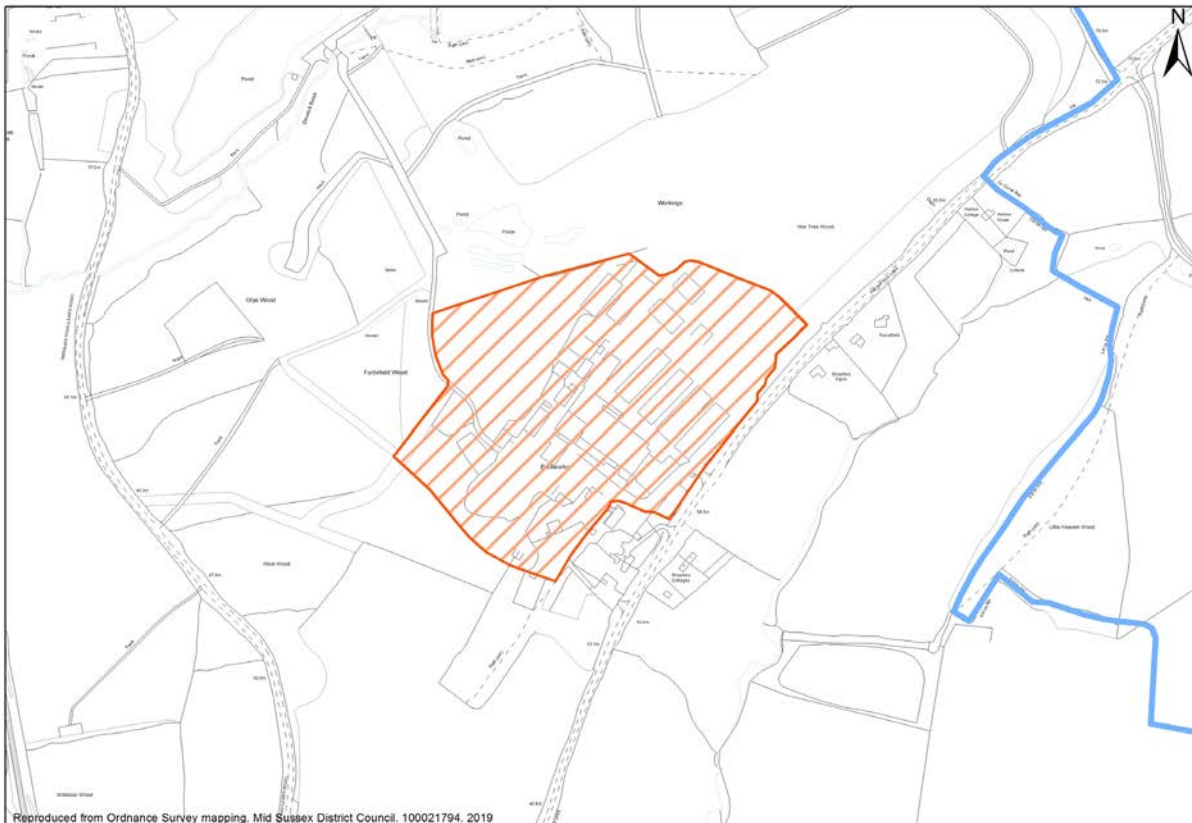
878

Settlement:

Horsted Keynes

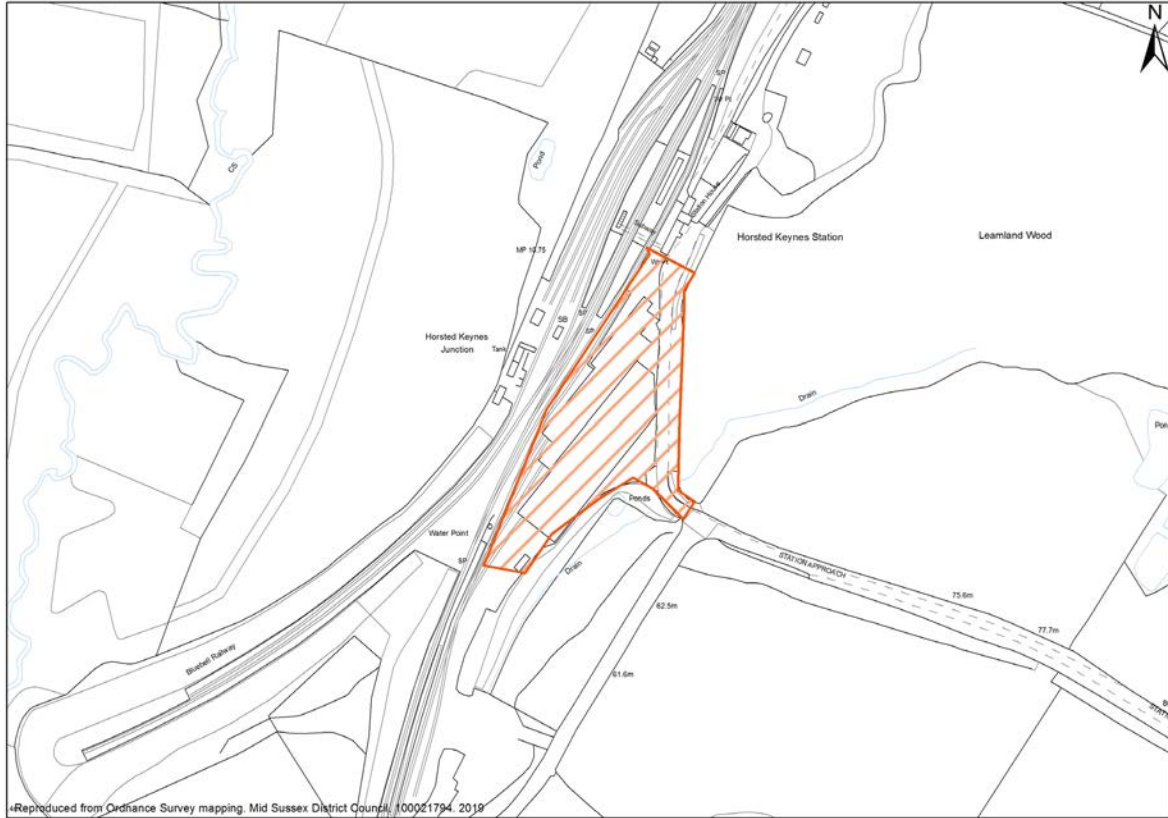
Gross Site Area (ha):

8.18



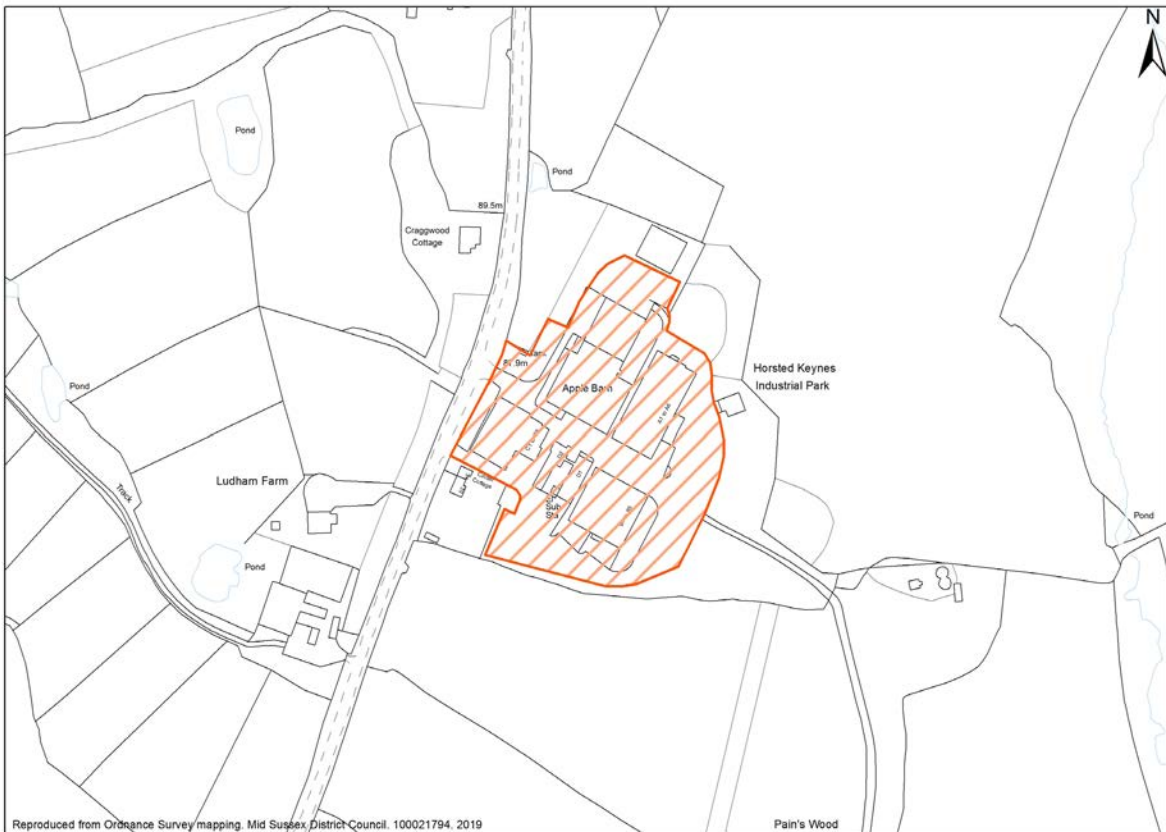
Horsted Keynes Station, Station Approach, Horsted Keynes

SHELAA: 880 Settlement: Horsted Keynes Gross Site Area (ha): 1.02



Horsted Keynes Industrial Park, Horsted Keynes

SHELAA: 879 Settlement: Horsted Keynes Gross Site Area (ha): 1.5



Danworth Farm, Cuckfield Road, Hurstpierpoint

SHELAA: 937 Settlement: Hurstpierpoint Gross Site Area (ha): 1.59



Kings Business Centre, Reeds Lane, Sayers Common

SHELAA: 669 Settlement: Hurstpierpoint & Sayers Common Gross Site Area (ha): 0.8



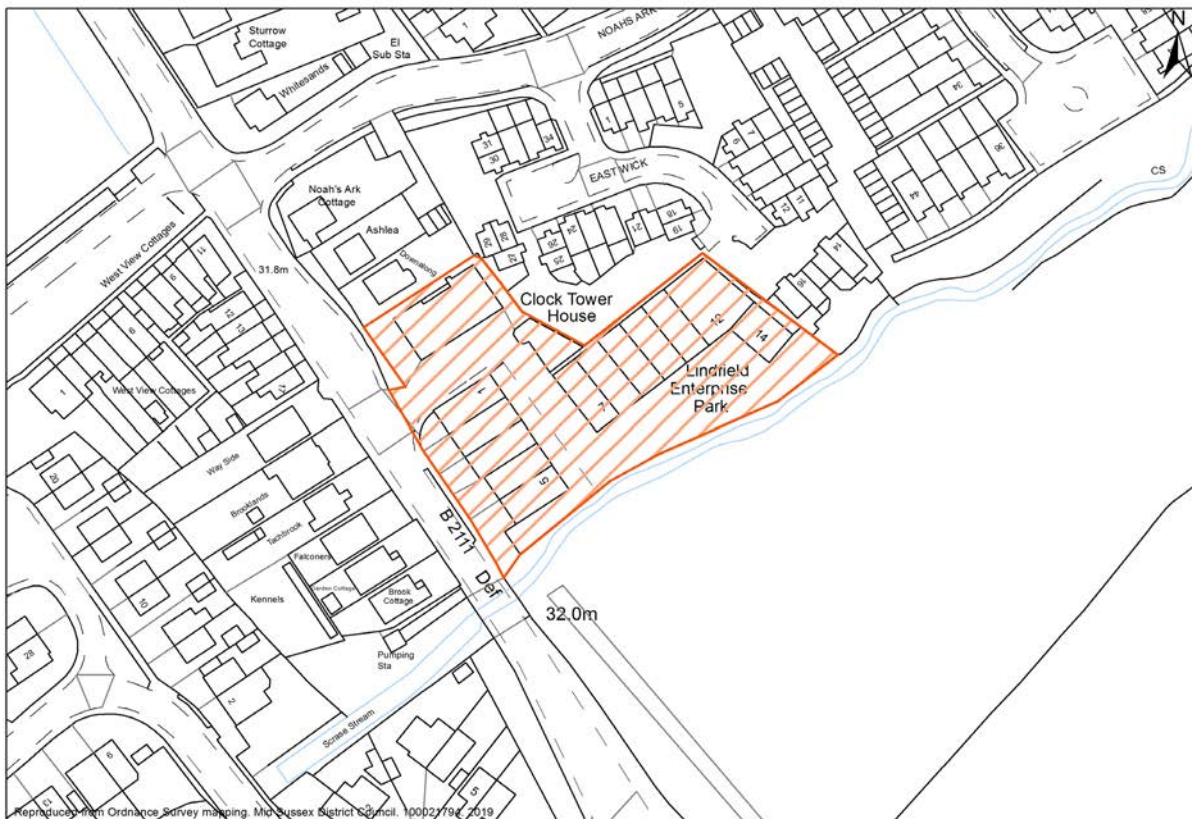
Valley Farm Business Park, Reeds Lane, Sayers Common

SHELAA: 883 Settlement: Hurstpierpoint & Sayers Common Gross Site Area (ha): 3.14



Lindfield Enterprise Park, Lewes Road, Lindfield

SHELAA: 884 Settlement: Lindfield Gross Site Area (ha): 0.4



Old Brighton Road South, Pease Pottage

SHELAA:

648

Settlement:

Pease Pottage

Gross Site Area (ha):

0.46



Land Off Brighton Road (Parking/Recycling Zone), Pease Pottage

SHELAA:

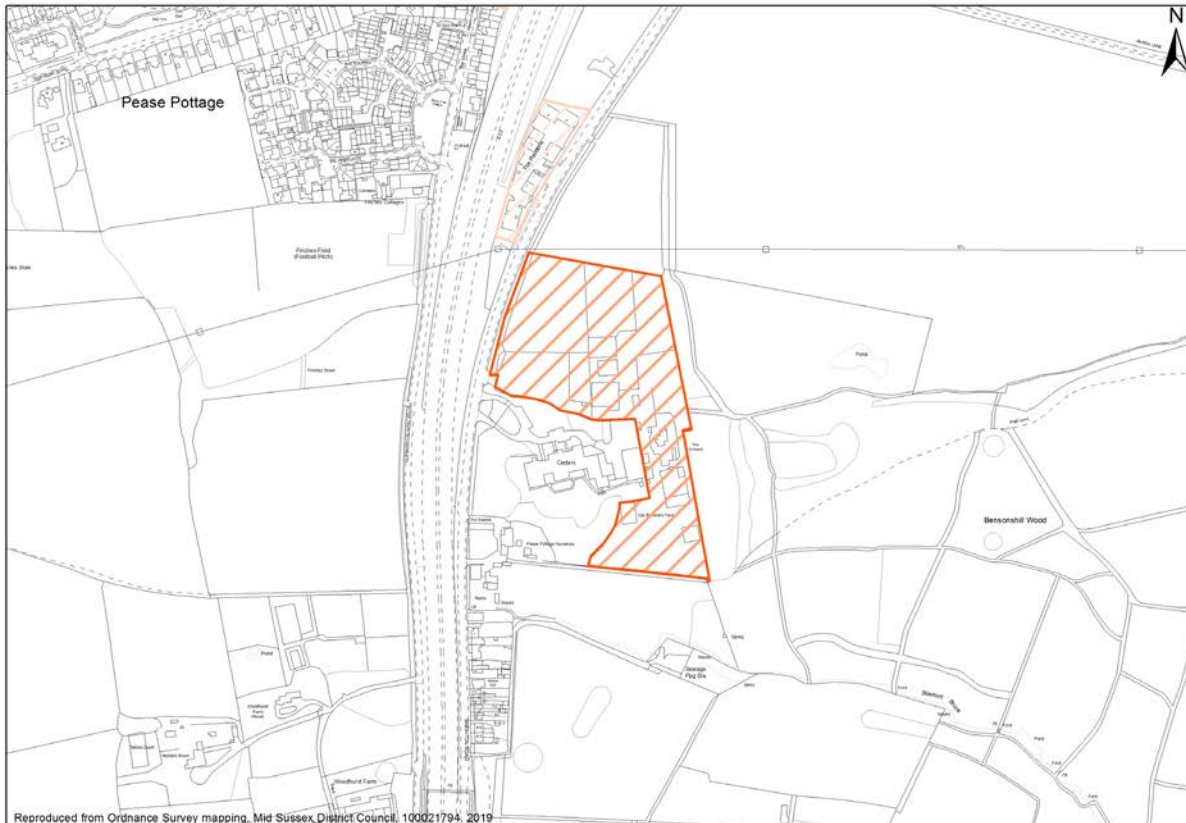
885

Settlement:

Pease Pottage

Gross Site Area (ha):

3.75



Avtrade Global, Reeds Lane

SHELAA:

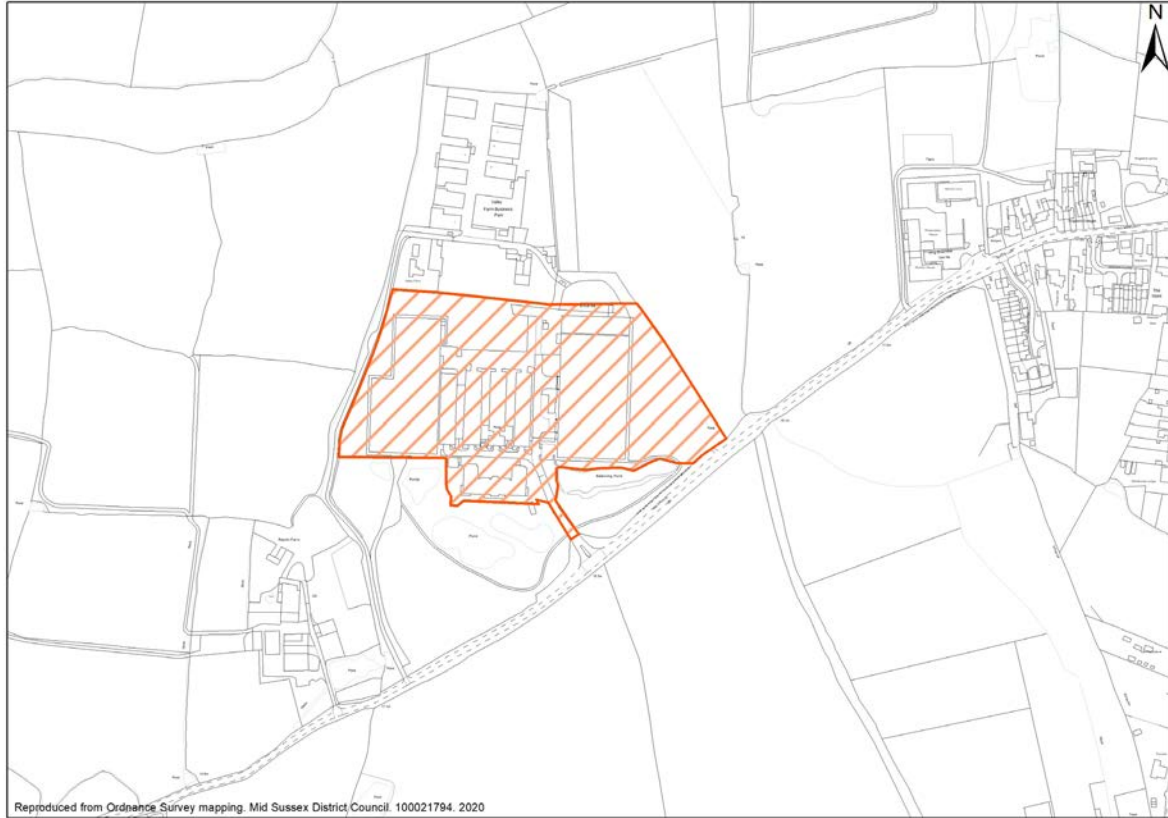
882

Settlement:

Sayers Common

Gross Site Area (ha):

4.03



Friday Ad, London Road, Sayers Common

SHELAA:

944

Settlement:

Sayers Common

Gross Site Area (ha):

1.36



The Pavillions, Brighton Road, Pease Pottage

SHELAA:

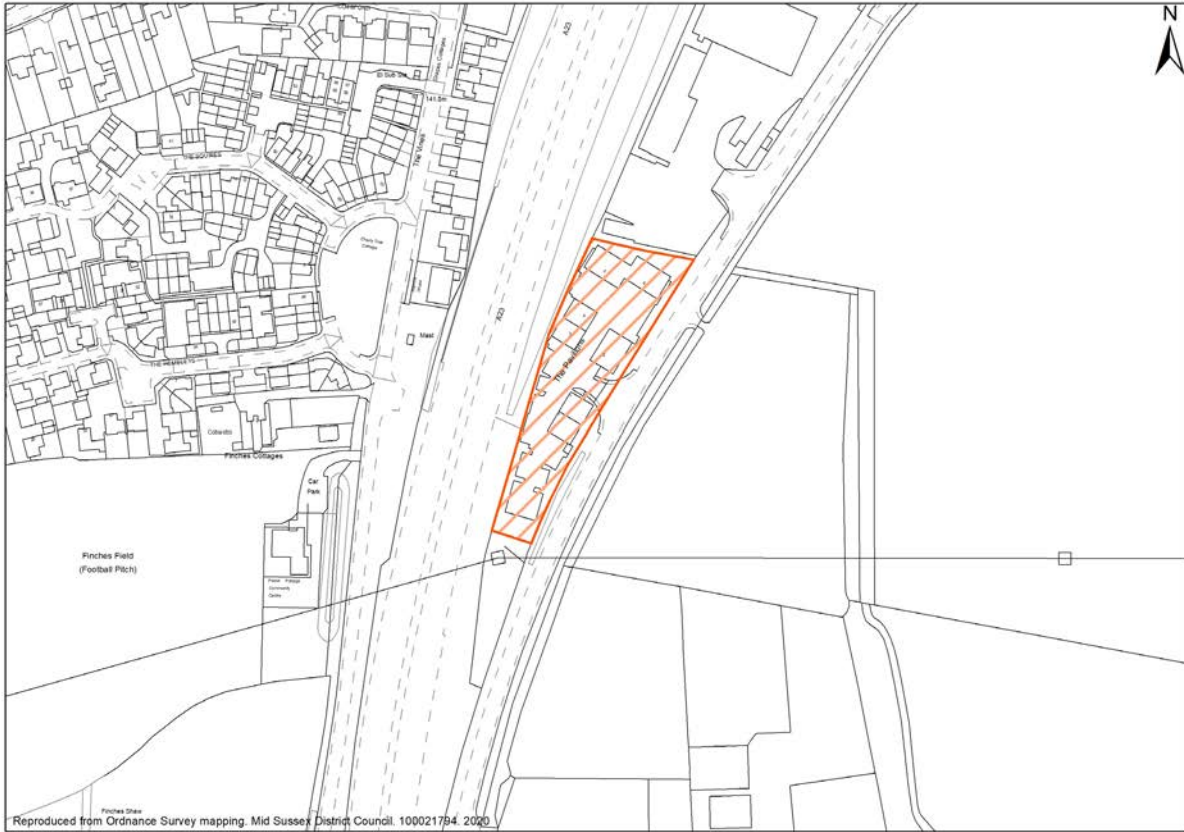
887

Settlement:

Slougham

Gross Site Area (ha):

0.56



Rowfant Business Centre, Wallage Lane, Rowfant

SHELAA:

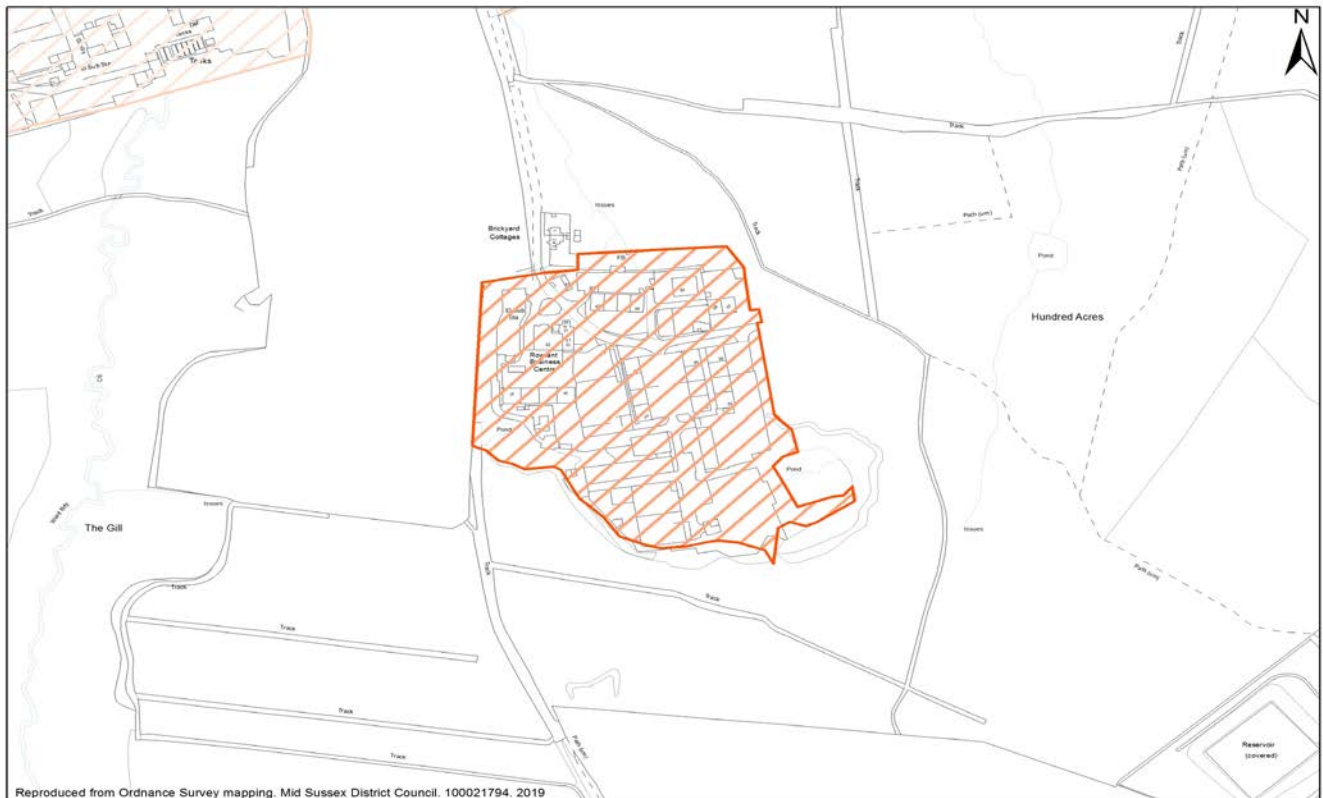
891

Settlement:

Turners Hill

Gross Site Area (ha):

4.15



Millwood Farm, East Street, Turners Hill

SHELAA:

927

Settlement:

Turners Hill

Gross Site Area (ha):

0.7



Rowfant Sawmills, Wallage Lane, Crawley Down

SHELAA:

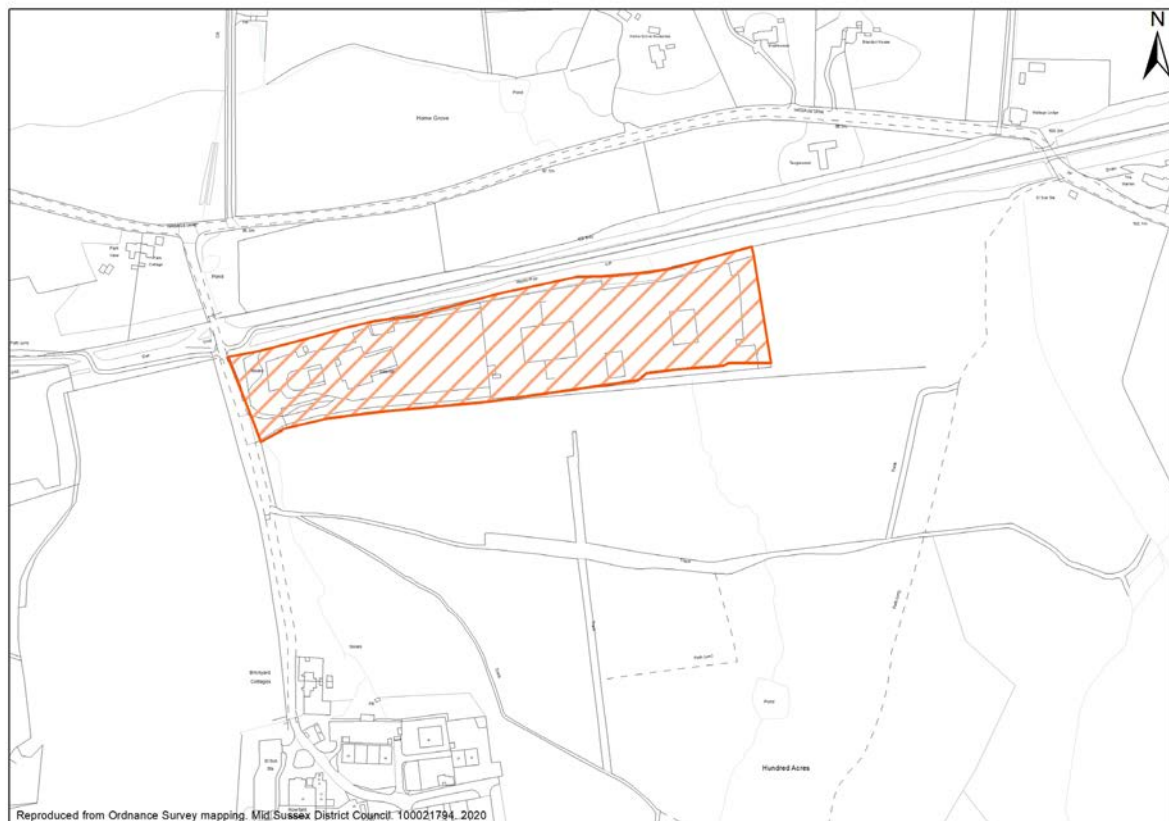
606

Settlement:

Turners Hill

Gross Site Area (ha):

2.8



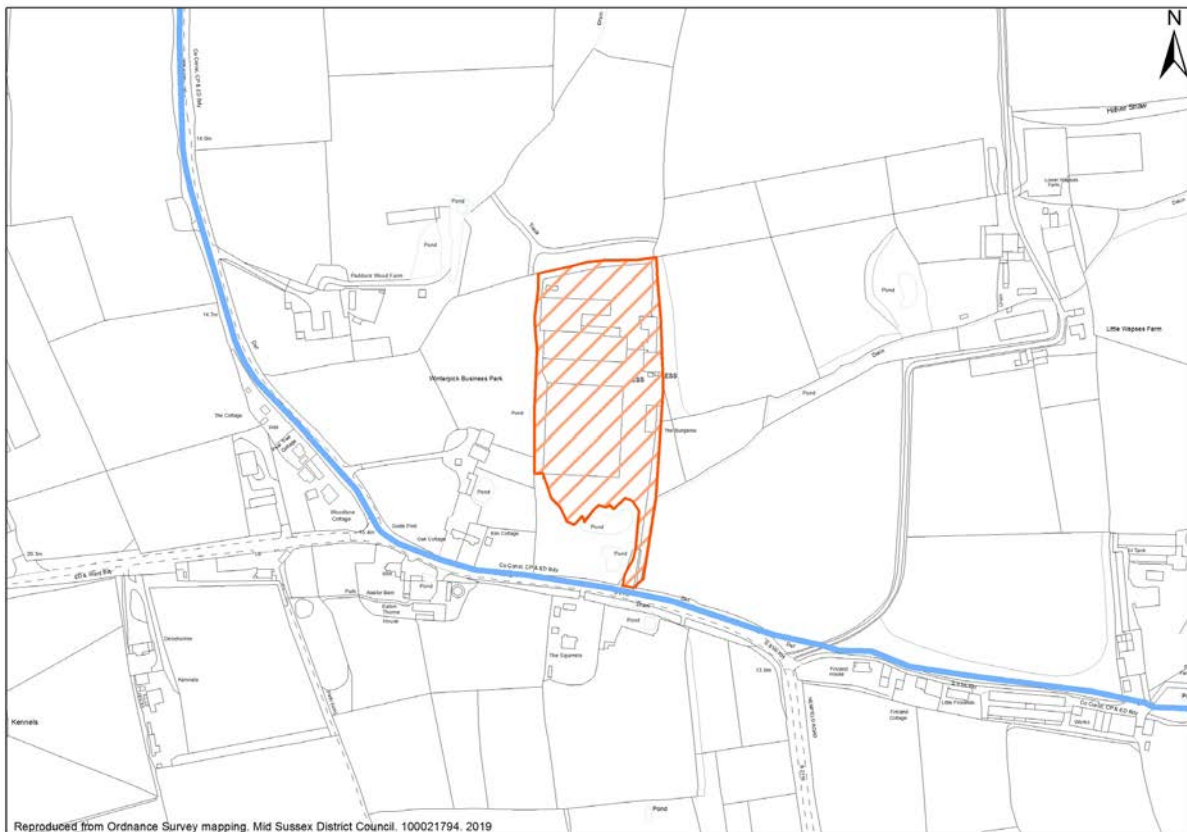
Land at Face Lift, London Road, Hickstead

SHELAA: 889 Settlement: Twineham Gross Site Area (ha): 0.9



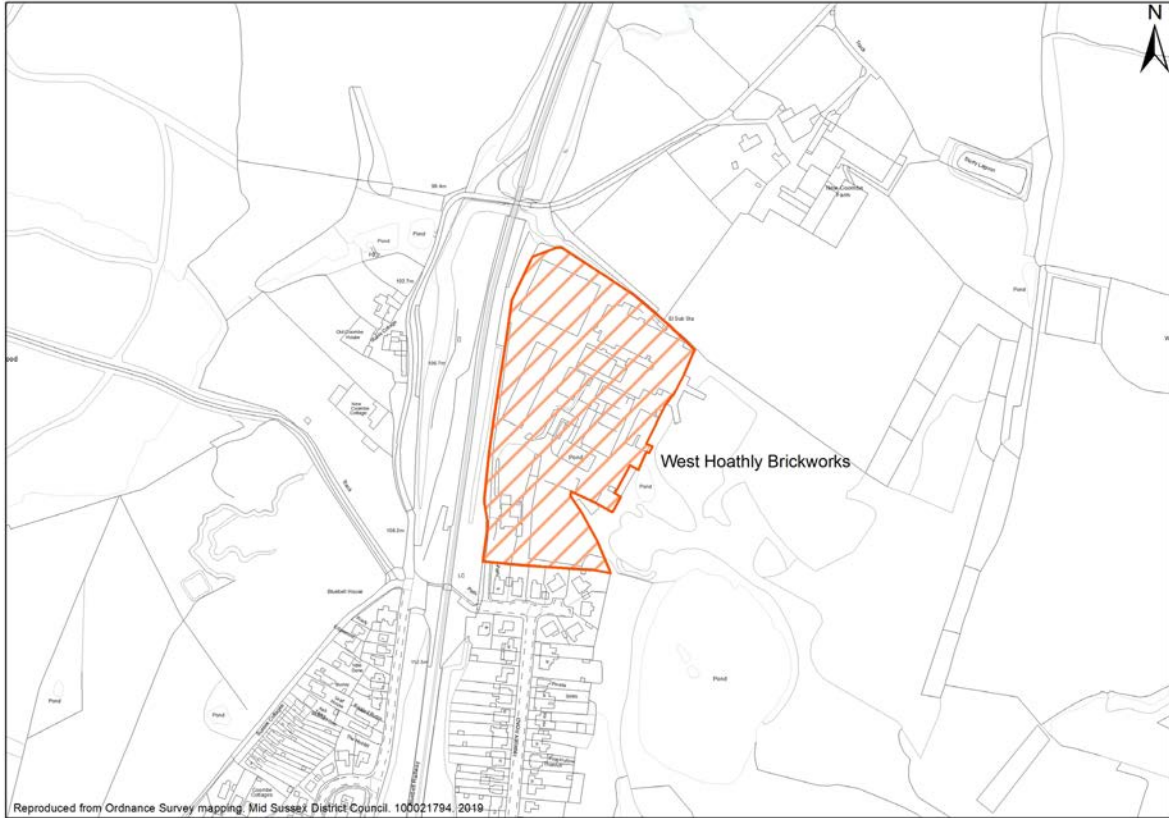
Winterpick Business Park, Hurstpierpoint Road, Henfield

SHELAA: 881 Settlement: Twineham Gross Site Area (ha): 2.5



Ibstock Brickworks, Sharpthorne

SHELAA: 386 Settlement: West Hoathly Gross Site Area (ha): 3.136



Hangdown Mead Business Park, Top Road, Sharpthorne

SHELAA: 928 Settlement: West Hoathly Gross Site Area (ha): 0.53



Appendix B: Monitoring Framework

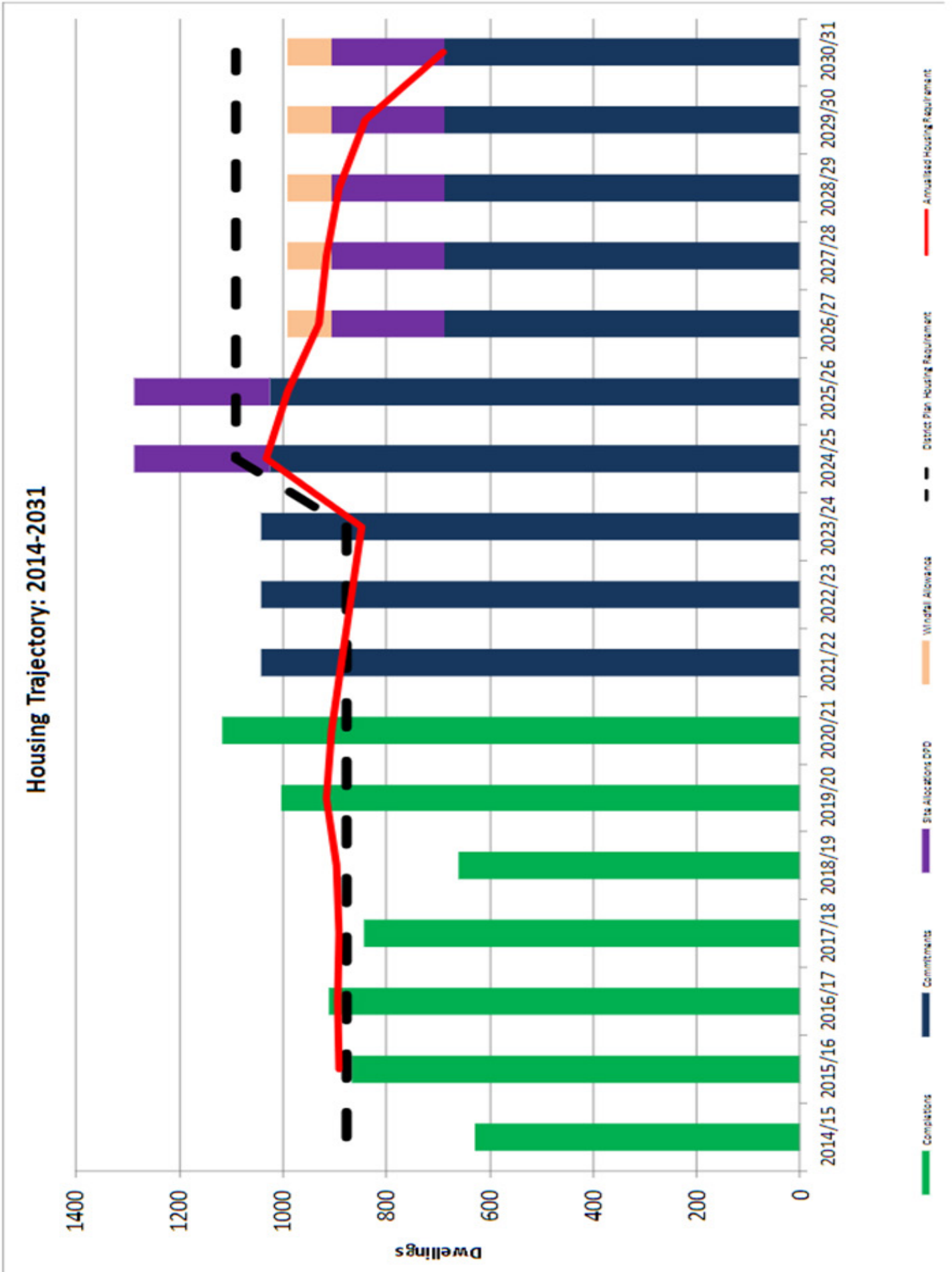
Monitoring Schedule

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA 1: Sustainable Economic Development – Additional Site Allocations	7,8	Amount of employment land available on additional employment site allocations	Delivery to support sustainable economic development	Developers Local Authority	MSDC Monitoring
SA 2 – SA 8: Employment Site Allocations					
SA 9: Science and Technology Park	7,8	Amount of employment land available by use class	Delivery of employment against the agreed phasing strategy, including use class mix	Developers Local Authority	MSDC Monitoring
SA 10: Housing	All	Net number of housing commitments by parish	Commitments in line with identified residual housing need	Developers, Local Authority, Highway authority, public agencies, utility companies and service providers	MSDC Monitoring
SA 11: Additional Housing Allocations	All	Net number of housing completions on additional housing allocations	Delivery to maintain identified requirement for five year housing land supply	Developers, Local Authority, Highway authority, public agencies, utility companies and service providers	MSDC Monitoring
SA 12 – 33: Housing Site Allocations		Completed infrastructure projects on additional housing allocations	Meet the infrastructure requirements set out in Infrastructure Delivery Plan (IDP)		

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA 34: Existing Employment Sites	7,8	Amount of employment land available on existing employment sites	Maximise to support sustainable economic development	Developers Local Authority	MSDC Monitoring
SA 35: Safeguarding of Land for Strategic Highway Improvements	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy if necessary	Highway Authority Local Authority	MSDC Monitoring
		Progress of transport schemes identified in policy	Delivery of transport schemes identified in policy		
SA 36: Wivelsfield Railway Station	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy if necessary	Highway Authority Local Authority	MSDC Monitoring
		Progress of expansion and upgrade of Wivelsfield railway station	Delivery of expansion and upgrade of Wivelsfield railway station		
SA 37: Burgess Hill/ Haywards Heath Multifunctional Network	6	Status of safeguarded land identified in policy	Continued safeguarding of land identified in policy	Highway Authority Local Authority	MSDC Monitoring
		Progress of strategic multifunctional network identified in policy	Delivery of a dedicated strategic multifunctional network identified in policy		

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA 38: Air Quality	2,3	Number of Air Quality Managements Areas (AQMAs) within the District	Minimise poor air quality in the District	Highway Authority Local Authority	MSDC Monitoring
		Number of applications refused as contrary to advice given by Environmental Protection Officer	Minimise poor air quality in the District		
SA 39: Specialist Accommodation for Older People and Care Homes	All	Net number of completions in Use Class C2	Maximise	Developers Local Authority	MSDC Monitoring
SA GEN: General Principles for Site Allocations	The Council has identified some of the additional information it intends to record if it is available.				
To include: SA 2-SA 28: Employment Site Allocations SA 9: Science and Technology Park SA 12-SA 33: Housing Site Allocations	1, 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		
		Location of secured biodiversity net gain (on-site or off-site)	Secure relevant and meaningful biodiversity net gain linked to wider nature recovery		

Appendix C: Housing Trajectory (as at 1st April 2021 updated for Main Modifications)



Glossary

Adopted Policies Map – This shows the sites identified for development and areas where particular policies apply. It will be updated as each part of the Development Plan is adopted.

Ancient Woodland – Areas that have had continuous woodland cover since 1600.

Area of Outstanding Natural Beauty (AONB) – Areas designated to conserve and enhance natural beauty, wildlife and cultural heritage; and to meet the need for quiet enjoyment of the countryside and have regard for the interests of those who live and work within them. For example, the High Weald AONB.

Commitments – Sites already in the planning process which have planning permission for residential development or are allocated in the Development Plan.

Development Plan – Is defined in section 38 of the Planning and Compulsory Purchase Act 2004 (as amended), and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the Development Plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Development Plan Document (DPD) – These contain the detailed policies and proposals of the Development Plan and are subject to a rigorous statutory process, including community involvement. They are required to carry out a Sustainability Appraisal and are subject to independent examination and Council agreement before adoption. These documents include the District Plan and the Site Allocations DPD.

District Plan – The Mid Sussex District Plan 2014-2031 is the Local Plan for Mid Sussex, setting out the spatial strategy and strategic policies for the district to deliver sustainable development.

Economic viability – The financial feasibility of development.

Evidence base – The evidence that any Development Plan Document is based on. It is made up of the views of stakeholders and background research about the area.

Green infrastructure – A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Habitats Regulations Assessment (HRA) – An assessment of the potential effects of planning policies on European nature conservation sites.

Infrastructure – Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open spaces.

Infrastructure Delivery Plan (IDP) – Identifies infrastructure needed to support new homes and businesses over the Plan period.

Local Development Scheme (LDS) – A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended). This document sets out the timetable for the preparation of Development Plan Documents which, when prepared, will comprise part of the Development Plan.

Local Economic Partnership (LEP) – Private/public sector partnerships that have a clear remit to drive sustainable private sector led growth. Mid Sussex is within the Coast to Capital LEP.

Local Nature Reserve (LNR) – Designated by the local authority and managed for either nature conservation or to provide recreational opportunities to communities.

Local Plan - A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community.

Monitoring Report – To support the Development Plan, the annual monitoring report assesses the implementation of the local development scheme and the extent to which policies in Development Plan Documents are being successfully implemented.

National Planning Policy Framework (NPPF) (2019) – The revised National Planning Policy Framework was updated on 19 February 2019 and sets out the government’s planning policies for England and how these are expected to be applied.

Neighbourhood Plans – A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood Development Plan in the Planning and Compulsory Purchase Act 2004.

Objectively Assessed Need (OAN) – The total amount of housing that would be needed to meet, as a minimum, expected levels of growth in population over the plan period.

Planning Practice Guidance – A web-based resource containing categorised planning guidance to accompany national planning policy.

Section 106 Agreement – A binding agreement between the Council and a developer on the occasion of granting a planning permission, regarding matters linked to the proposed development. Used to secure matters necessary to render planning applications acceptable by offsetting the costs of the external effects of development e.g. on local schools, which could not be secured through the imposition of planning conditions.

Section 278 Agreement – A binding agreement between the County Council and a developer used to secure necessary highway improvements to make development acceptable in planning terms.

Sites of Nature Conservation Importance (SNCI) – Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local Development Plan.

Sites of Special Scientific Interest (SSSI) – Areas identified by Natural England as being of special interest for their flora, fauna, or geological or physiographical features.

Special Area of Conservation (SAC) – Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Area (SPA) – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Statement of Community Involvement (SCI) – A document which sets out how the Council will engage communities on the preliminary stages of plan-making.

Strategic Access Management and Monitoring (SAMM) – A strategy setting out the measures that provide part of the mitigation for new residential development within 7km of the Ashdown Forest SPA. These measures focus on protecting the SPA from new recreational pressures through managing access (visitor) behaviour and monitoring both birds and visitors.

Strategic Flood Risk Assessment (SFRA) – An assessment by the District Council to inform the Local Development Framework of fluvial, surface water, groundwater, infrastructure and reservoir flood risks.

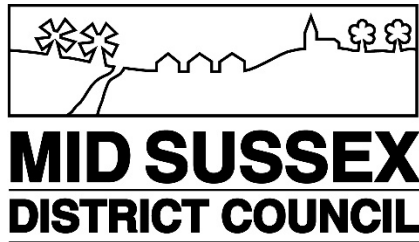
Suitable Alternative Natural Greenspace (SANG) – Green space that is of a quality and type suitable to be used as mitigation for the potential impact of development near the Ashdown Forest Special Protection Area.

Supplementary Planning Documents (SPD) – These give further explanation and detail to policies in the Development Plan. They are subject to a statutory process including community involvement and sometimes a Sustainability Appraisal. SPDs are not subject to independent examination, but require Council agreement before adoption.

Sustainability Appraisal – Sustainability Appraisal (incorporating Strategic Environmental Assessment (SEA)) is a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, economic and environmental factors). It is required under the Planning and Compulsory Purchase Act to be carried out on all Development Plan Documents and Supplementary Planning Documents.

Sustainable Development – At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable Drainage Systems (SuDS) – These are drainage systems designed to manage surface water and groundwater to sustainably reduce the potential impact of new and existing developments.



Site Allocation Development Plan Document 2022

Adoption Statement

Planning and Compulsory Purchase Act 2004 (as amended)

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Notice is given that in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Planning and Compulsory Purchase Act, this Adoption Statement hereby gives notice that on **29th June 2022**, Mid Sussex District Council adopted the Site Allocations Development Plan Document (the 'Sites DPD').

The Mid Sussex District Plan 2014-2031, adopted in March 2018, sets out a commitment for the Council to prepare a Site Allocations Development Plan Document (the 'Sites DPD') to ensure that housing and employment needs for the district are met in full.

The Site Allocations DPD has been subject to examination by an independent Inspector appointed by the Secretary of State. The Inspector's report on the Examination of the Sites DPD was received on 30th May 2022. The Inspector's report confirmed that, subject to incorporating a number of Main Modifications, the Plan is legally compliant, sound and capable of adoption. The Adopted Plan incorporates the Main Modifications recommended by the Inspector as set out in the Appendix to the Report on the Examination of the Site Allocations Development Plan Document.

Any person aggrieved by the adoption of the Site Allocations Development Plan Document may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004.

Any challenge pursuant to Section 113 must be made on the grounds that:

- (a) the document is not within the appropriate power and/or
- (b) a procedural requirement has not been complied with.

Any such application should be made promptly and, in any event, no later than the end of the six week period starting from the date on which the Plan was adopted.

Location of Documents for Inspection

In accordance with the Regulations the following documents have been made available to view:

- 1) The Site Allocations Development Plan Document;
- 2) This adoption statement; and
- 3) The Sustainability Appraisal Report document

They are available to view online at www.midsussex.gov.uk/SitesDPD

They are also available to view at the following deposit points. Note that, due to potential coronavirus restrictions, please check opening hours before commencing your journey.

Mid Sussex District Council Offices, Oaklands, Oaklands Road, Haywards Heath, RH16 1SS between 8.45am and 5.15pm Monday to Thursday and 8.45am and 4.15pm on Friday.

Libraries in Mid Sussex

Burgess Hill Library, 15-19 The Martlets, Burgess Hill, RH15 9NN (01444 255452) between 9.30am and 5.30pm on Monday to Friday and 10am and 4pm on Saturday.

East Grinstead Library, 32-40 West Street, East Grinstead, RH19 4SR (01342 332900) between 9.30am and 6pm on Monday to Friday, and 9.30am and 5pm on Saturday.

Hassocks Library, 9 Ewart Close, Hassocks, BN6 8FJ (01273 842779) between 9am and 1pm on Monday, Tuesday, Wednesday, Saturdays and from 1pm - 5pm on Thursdays to Friday.

Haywards Heath Library, 34 Boltro Road, Haywards Heath, RH16 1BN (01444 255444) between 9.30am and 6pm on Monday to Friday and 9.30am - 5pm on Saturday.

Hurstpierpoint Library, Trinity Road, Hurstpierpoint, Hassocks, BN6 9UY, (01273 832609) between 9am and 1pm on Monday, Tuesday, Wednesday and Saturday, and 1pm and 5pm on Thursday and Friday.

Help Points in Mid Sussex

Burgess Hill Help Point, Burgess Hill Town Council Offices, 96 Church Walk, Burgess Hill, West Sussex, RH15 9AS, (01444 247726) between 9am and 5pm Monday, Tuesday, Thursday and Wednesday 10am – 5pm and on Friday 9am to 4.30pm and on Saturday the Help Point is opened by Councillors from 10am – 12noon to discuss local issues (please note the normal Help Point services are not available on a Saturday).

Haywards Heath Help Point, Oaklands, Oaklands Road, Haywards Heath, West Sussex RH16 1SS, (01444 458166) between 8.45am and 5.15pm Monday to Thursday and 8.45am and 4.15pm on Friday.

For all enquiries, please contact the Planning Policy and Economic Development team at planningpolicy@midsussex.gov.uk or by telephone (01444) 477053.

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Appendix B

From: Robert Eggleston, [Address Redacted]

To: Kathryn Hall and Tom Clark, CEO & Head of Regulatory Services, MSDC

FOR YOUR URGENT ATTENTION

Kathryn Hall
Chief Executive
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

By email only to: kathryn.hall@midsussex.gov.uk

18 July 2022.

Dear Kathryn

Letter of Claim (sent pursuant to the Practice Direction on Pre-Action Conduct)

In the proposed matter of: Robert Eggleston and others v Mid Sussex District Council (“the Council”)

This letter is being sent in accordance with the Practice Direction on Pre-Action Conduct and Protocols (the Pre-action PD) contained in the Civil Procedure Rules (CPR). In particular, I refer you to paragraphs 13 to 16 of the Pre-action PD concerning the Court's powers to impose sanctions for failing to comply with its provisions. Ignoring this letter may lead to proceedings being commenced against the Council and may increase its liability for costs.

Along with the South of Folders Lane Action Group (SOFLAG), I have sought the advice of Dr Ashley Bowes of Cornerstone Barristers for the purposes of preparing this letter of claim

Background

On 29 June 2022, the Council adopted the Mid Sussex Site Allocations Development Plan Document (“the DPD”) by a resolution of its Full Council.

I participated in the consultations upon, and examination of, that DPD via my membership of South of Folders Lane Action Group (“SOFLAG”). Along with many residents, who may also be party to this claim, I had particular concerns with policies SA12 and SA13 and responded to the main modifications consultation via SOFLAG and in my personal capacity. Representations were also made by several local authorities.

Issues

I am aggrieved by the decision to adopt the DPD because the decision to adopt was outside the Council’s powers.

Particularly, in breach of the obligation at **Regulation 8(2) Environmental Assessment of Plans and Programmes Regulations (SI 2004/1633)**, the Council adopted the DPD without taking account of the

environmental report prepared under those regulations or the opinions expressed in response to that report.

The report to the Council on 29 June 2022 did not append a copy of environmental report or consultation responses received in connection with the July 2020 version of the report or the addendum report dated November 2021, nor did it contain a summary of its contents or the consultation responses which had been received.

The report did not list the environmental report and consultation responses expressly as “background papers”. The report simply explained that the “full evidence base, examination library and examination documents” were available via a link on p.23 of the Council Report. At the time of the meeting, that link (www.midsussex.gov.uk/SitesDPD) did not go through to a webpage including the final environmental report and consultation responses. The final environmental report was only uploaded to that page on 7 July 2022.

Background papers are required to be listed by **s.100D(1) Local Government Act 1972** and defined by **s.100D(5)** as those documents which:

“(a) disclose any facts or matters on which, in the opinion of the proper officer, the report or an important part of the report is based, and

(b) have, in his opinion, been relied on to a material extent in preparing the report.”

Given the legal obligation to expressly list such documents, it is notable that the environmental report and consultation responses to it were not expressly noted as being “background papers”.

In any event, members are not to be taken to have considered a background document unless they are expressly told to read it, a link to the documents is not sufficient for that inference to be properly drawn, see: **R(Hunt) v North Somerset Council** [2013] EWCA Civ 1320 *per* Rimmer LJ at [83]-[84].

The final environmental report did not even appear to be publicly available prior to the meeting and only appeared on the Council’s website (together with the adoption statement) **after** the 29 June meeting, when the website page was updated on 7 July 2022.

The report to Council on 22 July 2020 (which sought approval to conduct a Regulation 19 consultation and thereafter submit the DPD) only contained the non-technical summary of the environmental report and did not (nor could not) summarise the responses to it because that consultation had yet to be conducted.

It follows that the Council acted outside the powers of the Act and a potential claim under s.113 brought on that basis is likely to be successful.

It is impossible to say whether the decision to adopt would, necessarily, have been the same had the legal requirements been complied with. The Regulations presuppose the prescribed information is considered and, therefore, there is no realistic prospect of a Judge assuming it would have made no difference to the outcome.

I acknowledge that the Court has a range of remedies should it identify an error of law in the adoption of a document such as the DPD.

The most appropriate remedy here would be an order quashing the decision of the Council to adopt the DPD on 29 June 2022 and an order remitting the DPD to Full Council to reconsider the question of

adoption, ensuring that the necessary information prescribed at **Regulation 8(3) of the 2004 Regulations** was before members.

Moreover, it would be inappropriate for the DPD to guide the determination of development management decisions in the meantime and so it would also be appropriate for the Court to grant an interim order, suspending the operation of the DPD until it has been lawfully adopted.

Action you are expected to take

In accordance with paragraph 6(b) Practice Direction on Pre-Action Conduct, I (and my co-claimants) expect a response in a reasonable time. Given the clear-cut nature of the error of law, the short time limit within which a claim must be filed and the pragmatic steps I propose to remedy the situation, I expect a response by **29 July 2022**.

I invite the Council to indicate that it will consent to an order:

- Quashing the decision to adopt the DPD on 29 June 2022.
- Remitting the decision to adopt the DPD back to Full Council.
- Suspending the operation of the DPD in the meantime.
- Paying my reasonable costs of bringing the claim.

If the Council do not so consent, I shall proceed to issue a claim under s.113 and seek the interim relief I have indicated. It may take many months before such a claim reaches a final hearing and further time before a judgment is handed-down. It will also incur the Council significant expense and disrupt the delivery of sustainable development in the District. For those reasons, I invite the Council to accept my proposed course of action as a practical means of ensuring the DPD is lawfully adopted and taxpayers' money is preserved.

I reserve the right to draw attention to this letter and in particular, the offer of a way forward, if you decline to accede to my suggestion and the Court is called upon to assess the principle and level of costs.

Costs

I invite you to confirm in writing that the subject matter of the claim would fall within the scope of the Aarhus Convention and, accordingly, this would be an "Aarhus Convention Claim" for the purposes of Part VII CPR 45.

Interested Parties

A copy of this letter is being sent to the owners of the land comprising the largest allocations in the DPD (SA12 and SA13):

- Jones Homes Limited 5 Cornfield Terrace, Eastbourne, East Sussex, BN21 4NN.
- Persimmon Homes Limited Persimmon House, Fulford, York, YO19 4FE.
- Thakeham Homes Limited Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, England, England, RH14 9GN.

Should you consider there are other Interested Parties to whom a copy of this letter should be sent, please do let me know and I will arrange the same.

Alternative dispute resolution

As the Council is presently *functus officio* I do not consider this matter is amenable to ADR, however I have proposed a pragmatic and cost-effective way forward to remedy the legal defect.

Address for the supply and service of court documents

I am in the process of engaging a solicitor to administer the claim but in the meantime, please direct correspondence to me at:

Council - 10 August 2022

Robert Eggleston

[Address Redacted]

Email [Email-Address Redacted]

Proposed reply date

In accordance with paragraph 6(b) Practice Direction on Pre-Action Conduct, I respectfully request a response by **1600 on 29 July 2022.**

Yours sincerely

Robert Eggleston

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Appendix C

Site Allocations Development Plan Document

Statement of Consultation

Regulation 22(1)(c)

Appendix 10

**Summary of Responses (Regulation 19) – Evidence Base
and Policies Map**

December 2020

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Sustainability Appraisal

Number of Comments received

Total: 33	Support: 2	Object: 30	Neutral: 1
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Comments	MSDC Response
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<p>General comments</p> <ul style="list-style-type: none"> Generally support the approach taken in the sustainability appraisal (691 – Pegasus, 738 – DMH Stallard) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The assessment process is considered robust and it is considered that it demonstrates that the sites selected are the most appropriate for development (701 - Sunleys) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The assessment process has been robust, and it is considered that this demonstrate that the sites selected are the most appropriate for development (2218 - Hargreaves Management) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The SA is silent on elderly accommodation. It failed to identify the need for specialist accommodation as a sustainability issue and therefore does not consider reasonable alternatives to address the need. (709 - Barton Willmore) 	<ul style="list-style-type: none"> The approach to specialist accommodation for older people is detailed within Provision of specialist accommodation for the Elderly (TP4). The District Plan sets out the strategy in this respect and it is not for the Site Allocations DPD to revisit this approach.
<ul style="list-style-type: none"> The delivery of the eastern part of the SA37 network, linking Haywards Heath and Burgess Hill, will be a likely significant effect of a beneficial nature within Lewes District and therefore should be considered as a cross-boundary impact likely to arise from the plan. (1715 - Parker Dann) 	<ul style="list-style-type: none"> Agreed that the proposed eastern route under policy SA37 will immediately benefit a small number of Lewes District residents living on the edge of Burgess Hill.
<ul style="list-style-type: none"> The SA is unduly reliant upon, and constrained by, indicative and untested settlement figures, which has led to the allocation of unsustainable sites having regard to alternatives that exist in the District. (705 - Nexus) 	<ul style="list-style-type: none"> The Strategy for the DPD is set out the District Plan which provides the overarching development alternatives for the SA. It is not the role of the Sites DPD to re-assess the Council's housing need or establish options for it. This will be carried out within the District Plan Review.
<ul style="list-style-type: none"> The impact of traffic is overlooked within the DPD which is reflected in the SA which includes a lot of uncertainty in the site assessments 	<ul style="list-style-type: none"> The Sites DPD is supported by robust Transport evidence that also informed conclusions of the SA.
<ul style="list-style-type: none"> The Sustainability Appraisal reports that the Council currently lacks data to distinguish Grade 3 from 3a agricultural land and assumes a default classification of 3 without evidence (2383 - Infrastructure First) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The lack of ecological information available makes it hard to assess the potential impact of any site allocations or the assessment of their suitability against the SA Objectives (748 – Sussex Wildlife Trust) 	
<p>Context and baseline</p> <ul style="list-style-type: none"> The SA that accompanies the Regulation 19 consultation does not refer to the latest evidence and data and is therefore not a sound basis to develop the Site Allocations against. (1987 & 2031 Wates) 	<p>Context and baseline</p> <ul style="list-style-type: none"> As described in the SA, the most up-to-date data has been used. Older data has been used where the most up-to-date information has not yet been released.
<p>Sustainability framework</p>	<p>Sustainability framework</p> <ul style="list-style-type: none"> The objectives and indicators identified for the purpose of the

<ul style="list-style-type: none"> The framework should be reviewed to reflect the current COVID-19 context (684, 757 - Strutt and Parker) 	<p>sustainability appraisal are considered to remain relevant in the current COVID-19 context.</p>
<ul style="list-style-type: none"> The framework should include a landscape objective. 	<ul style="list-style-type: none"> Landscape is included under objective 9 of the SA.
<p>Housing – reasonable alternatives</p> <ul style="list-style-type: none"> The SA/SEA has not considered/assessed all reasonable alternatives which suggests that the Draft SA DPD has not been positively prepared as it does not meet the objectively assessed needs of the Category 3 Settlements or is justified by not having the most appropriate strategy when considered against the reasonable alternatives (684, 757 - Strutt and Parker) 	<p>Housing – reasonable alternatives</p> <ul style="list-style-type: none"> The process followed to arrive at the preferred housing site options is detailed in section 6 of the SA and flows from the spatial distribution set out in the District Plan which was itself subject to Sustainability Appraisal. It is not the role of the Sites DPD to re-establish the strategy. The SA is clear about the logical approach to establish reasonable alternatives. It is not the role of the Sites DPD to re-assess the Council's housing need or establish options for it. This will be carried out within the District Plan Review.
<ul style="list-style-type: none"> The SA fails to identify a reasonable alternative of no further growth at East Grinstead based on the Habitats Directive and potential impacts upon the Ashdown Forest SAC. (705 - Nexus) 	
<ul style="list-style-type: none"> The SA fails to identify reasonable alternatives at Haywards Heath. (705 - Nexus) 	
<ul style="list-style-type: none"> The Options presented were not sufficiently different in terms of addressing the approved spatial strategy. (708 - K LW) 	
<ul style="list-style-type: none"> The SA does not assess the alternative to direct growth outside the AONB (708 - K LW) 	
<ul style="list-style-type: none"> Concern that the Council have not rigorously considered the reasonable alternative of allocating more of, or all of, the remaining 47 sites (that meet the Council's own suitability criteria) (753 & 1443 - Lewis & Co Planning) 	
<ul style="list-style-type: none"> It is unclear in the SA how the alternative options for housing supply were arrived at. No consideration was given to providing for anything over and above the residual housing requirement. (791 - Wates) 	
<ul style="list-style-type: none"> The SA fails to assess to reasonable alternatives. All suitable options have not been appropriately identified. (1987 & 2031 - Wates) 	
<ul style="list-style-type: none"> The SA focusses solely on the sustainability of sites rather than considering the benefits of providing housing in different locations. (1987 & 2031 - Wates) 	
<ul style="list-style-type: none"> It is not considered that the assessment of the housing options is a sufficient enough assessment of reasonable alternatives as required by guidance and legislation. (2065, 2067, 2079 & 2080 - Denton) 	
<p>Housing – site specific comments</p> <ul style="list-style-type: none"> SA13 is incorrectly categorised 'marginal' when assessed against the sustainability framework - the respondent provided a scoring system to show that the proposed allocated site scored better than some other site categorised as performing well (691 - Pegasus) 	<p>Housing – site specific comments</p> <ul style="list-style-type: none"> Site appraisals are kept under review should any updates to site assessment in the Site Selection Paper 3: Housing arise (SSP3). However, the Council applied the same methodology to assess each site against the sustainability framework and is therefore confident that the sustainability appraisal provides a consistent assessment of reasonable housing site options. Alternative scorings submitted by alternative site proponents and
<ul style="list-style-type: none"> The SA includes errors, omissions and inconsistencies for sites south of Folders Lane 	
<ul style="list-style-type: none"> The site land West of Sayers Common (SHELAA ref. 857) should be considered to be a reasonable alternative (708 - K LW) 	
<ul style="list-style-type: none"> The assessment of Land opposite Stanford Avenue, London Road, Hassocks (SHELAA ref. 221) has 	

<p>been excluded through the SA based on a flawed assessment in comparison to other sites. (753 - Lewis & Co Planning)</p>	<p>objectors would not be consistent with the approach used within the SA.</p>
<ul style="list-style-type: none"> There are inconsistencies in the SA in the assessment of sites in Horsted Keynes (in particular, SHELAA sites #68, #69, #184 (SA29), #216 (SA28), #807, #971). The assessments have been flawed due to incorrect assumptions being made, or wrong data being used for different aspects of the sustainability assessment. This has had a direct impact on which sites have been selected. 	
<ul style="list-style-type: none"> The findings of the SA are supported, however the assessment of the HH Golf Course (SHELAA ref. 503) site contains inaccuracies which need to be rectified. 	
<ul style="list-style-type: none"> The SA fails to identify measures to mitigate the impact of the proposed sites in East Grinstead and Felbridge, either alone or in combination with sites already committed in the Local Development Plan (738 – DMH Stallard) 	
<ul style="list-style-type: none"> The site at Clearwater Farm Site (SHELAA ref. 841) was incorrectly discounted at the Stage 2 assessment leading to all reasonable alternatives not being considered within the SA and failure to assess a reasonable alternative the delivery of the modal shift aspiration of policy SA37. (1715 - Parker Dann) 	
<ul style="list-style-type: none"> The Sustainability Appraisal is superficial, inaccurate in places and fails to consider all reasonable potential sites, in particular closer to Crawley – the respondent has provided suggestion to correct the SA. (2383 - Infrastructure First) 	
<ul style="list-style-type: none"> The SA is inadequately evidenced in respect of transport and biodiversity in respect of policies SA12 and 13 	
<ul style="list-style-type: none"> There are errors within the SA with regard to SA32, there is no GP surgery in the village (597 - Turners Hill Parish Council) 	
<p>Employment</p> <ul style="list-style-type: none"> An additional alternative should be considered for employment to allocate over and above the identified need to adopt a flexible approach given the various factors which impacts on uncertainty. (789 - Dukesfield) 	<p>Employment</p> <p>The reasonable alternatives for sites to meet the District Plan employment need are identified within the Site Selection paper 4: Employment (SSP4). Within the SA, sites were grouped in three categories to be assessed against the sustainability framework and were all considered for allocation at this stage. Sites were subsequently discounted due to their likely impacts on the social, environmental and economic objectives.</p>

Habitats Regulations Assessment – General Comments

Number of comments received

Total: 3 **Support:1** **Object: 1** **Neutral: 1**

Comments

MSDC Response

- Concur with the findings of the HRA report for both air quality and recreational pressure, providing that all required mitigation measures are appropriately secured in any future planning permissions given (710 - Natural England).

- Noted

- The SDNPA and MSDC are members of the Ashdown Forest Working Group which is chaired by the SDNPA. No concerns raised regarding the proposals in the Regulation 19 consultation document and air quality impacts on the Ashdown Forest SAC. Look forward to continue working together alongside other partners of the Working Group (777 - South Downs National Park Authority).

- Notes

- Natural area developed (Individual).

HRA is a process to ensure that a plan or project being undertaken or permitted by a public body will not adversely affect the ecological integrity of a European wildlife site, in this case the Ashdown Forest SPA and SAC. Ashdown Forest is within Wealden District. None of the proposed site allocations will result in development on Ashdown Forest. Mitigation for recreational pressure in the form of SANG and SAMM will be required for the proposed housing site allocations within the 7km zone of influence.

Policies Maps

Number of Comments Received

Total: 13 **Support: 2** **Object: 11** **Neutral: 0**

Comments

MSDC comments

<ul style="list-style-type: none"> Inset 11a East Grinstead – principle of including site (land south of 61 Crawley Down Road, Felbridge in built up area is supported (ABC, 2080) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Inset 8a Copthorne – support amendments to include extent of development site (Terence O'Rourke, 654) 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Inset 19 Turners Hill – objection to continued designation of the Crawley – East Grinstead Strategic gap. There is no justified policy basis (Chilmark, 1458) (Jackson Planning, 1781) 'Key' diagram on page 13 does not contain the strategic gap so is inconsistent with the Inset map. (Jackson Planning, 1781) 	<ul style="list-style-type: none"> The Turners Hill Neighbourhood Plan, policy THP8 provides the policy justification for the strategic gap indicated on inset maps 19 and 19a The purpose of the key diagram is to provide an overview of the allocations and not to replicate the detail of the policies map and there is no inconsistency between the two documents.
<ul style="list-style-type: none"> Inset 12a Hassocks – built up area should be amended to include Byanda, (Nexus Planning, 2001) 	<ul style="list-style-type: none"> The Hassocks Neighbourhood Plan was made in April 2020. Some amendments to BUA were made at this time in accordance with DP6. As there has been opportunity for the parish Council to alter BUA at this location relatively recently, it is not considered appropriate to amend as part of the Site Allocations DPD.
<ul style="list-style-type: none"> Inset 2 – Ansty and Staplefield (Haywards Heath incorrectly referred to in rep. The proposals map should be amended to include the allocation to the East of Borde Hill Lane. (Woolf Bond Planning, 1454) 	<ul style="list-style-type: none"> The Council does not agree that the omission site should be allocated and therefore no change to the policies map is required.
<ul style="list-style-type: none"> Inset 17a Scaynes Hill – built up area should be amended (DMH, 762) (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 7/8 (TP2)
<ul style="list-style-type: none"> Inset 7 Burgess Hill – Seven residential properties to the east of SA12 should be included in built up area (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 6 (TP2).
<ul style="list-style-type: none"> Inset 10 Cuckfield – Area to the east of SA23 should be included within built up area. (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 7. (TP2)
<ul style="list-style-type: none"> Inset 3a Ardingly – Area to the east of Selsfield Road (south Cobb Lane) should be included within the built-up area. (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 6 (TP2).
<ul style="list-style-type: none"> Inset 4 Ashurst Wood – Land at Yewhurst, adjacent to SA26 should be included in the built-up area. (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 6 (TP2).
<ul style="list-style-type: none"> Inset 19 Turners Hill – Withypitts Farm house building to the south of SA32 should be included in the built-up area (DMH, 761) 	<ul style="list-style-type: none"> No change. See Built up Area boundary Topic Paper, page 6 (TP2).

Infrastructure/ Infrastructure Delivery Plan

Number of comments received

Total: 7 **Support: 0** **Object: 5** **Neutral: 2**

Comments

MSDC Response

<ul style="list-style-type: none"> Concerns were raised in relation to the capacity of the sewerage network in the north of the District, as well as water supply in Mid Sussex. (625 - Worth Parish Council) 	<ul style="list-style-type: none"> Infrastructure provision and improvements to support the delivery of the Site Allocations DPD have been identified within the accompanying Infrastructure Delivery Plan (IV1), which includes reinforcement of the sewerage network at various locations across the District. It is acknowledged that some items may not be included for each site such as digital infrastructure, however such provision is required under policy DP23 and is expected to be delivered as part of the development as opposed to being considered as a developer contribution. 	
<ul style="list-style-type: none"> The Local Plan should contribute to ensuring that appropriate digital infrastructure is delivered alongside new development to ensure that the local and national economy is appropriately supported. (625 - Worth Parish Council) 		
<ul style="list-style-type: none"> Further development should not be proposed in areas where the water demand cannot be coped with, such as Handcross (1423 – resident; 2420 resident). 		
<ul style="list-style-type: none"> There is missing information in relation to the estimated cost of police, bus infrastructure and other infrastructure within the IDP (1430 - resident) 		<ul style="list-style-type: none"> The IDP contains the latest information available and will be updated as and when more information becomes available from infrastructure providers
<ul style="list-style-type: none"> Infrastructure should be improved ahead of new development being allocated to remediate current issues (1722 - Lindfield Parish Council) 		<ul style="list-style-type: none"> The timing of infrastructure delivery will be discussed on a case by case basis with infrastructure providers to ensure that capacity is available to accommodate future development so that new development is appropriately served by infrastructure.
<ul style="list-style-type: none"> Existing essential services inadequate, nothing implemented from previous development (2209 - resident) 		
<ul style="list-style-type: none"> The Infrastructure Delivery Plan fails to acknowledge the need to provide for specialist accommodation, such as extra care accommodation (709 - Barton Willmore) 		<ul style="list-style-type: none"> The approach to specialist accommodation for older people is detailed within the Topic Paper: Housing for Older People (TP4).

Community Involvement Plan

Number of Comments Received

Total: 5 **Support: 0** **Object: 1** **Neutral: 4**

Comments

MSDC Response

Felbridge form

- MSDC has failed to deliver on its Statement of Community Involvement.

- As statutory consultees all Town and Parish Councils and adjacent local planning authorities were alerted to both the Regulation 18 and 19 consultations.
- A summary of responses to the Regulation 18 consultation was published in the Council's Statement of Consultation (August 2020) (C3). This includes Actions to Address Objections.
- Consultation has been undertaken in accordance with the Statement of Community Involvement and the Regulations.

- Ineffective methods of communication used to alert residents and hard to reach groups of consultation.

- Consultation has been undertaken in accordance with the Statement of Community Involvement and the Regulations.

- Only a single press release in Mid Sussex Times; not distributed to Felbridge or East Grinstead.

- Press release issued but Council has no control over which publications choose to include the article

- No mention of consultation of Council's landing page, Planning and Building' or dedicated 'Consultations' webpages.

- All consultation documents and supporting evidence were available on the council website.

- No alerts in Mid Sussex Matters magazine.

- Due to timing of publication and approval of documents for consultation.

General

- Felbridge Parish Council was not contacted at any point during the development of the DPD. (534 – Felbridge Parish Council).

- Consultation has been undertaken in accordance with the Statement of Community Involvement and the Regulations

- Tandridge District Council were not informed of Regulation 19 consultation (534 – Felbridge Parish Council)

- As statutory consultees all Town and Parish Councils and adjacent local planning authorities were alerted to both the Regulation 18 and 19 consultations. Tandridge District Council have been fully involved in the preparation of the DPD, as set out in the SoCG (DC13).

- Consultation form too complicated

- Planning regulations govern the content of response for the Regulation 19 consultation.

- Community engagement virtually impossible to achieve given the knowledge needed and jargon used.

- Consultation has been undertaken in accordance with the Statement of Community Involvement and the Regulations

- No feedback or explanation on why detailed objections have been ignored.

- Comments received during regulation 18 stage were fully reported to Members, via Scrutiny and Council meetings.

- Limited number of people that buy the local newspaper to see press release.

- Noted

- Email alert only effective for those that have signed up

- Noted

- Was there any promotion of consultation at libraries during Covid-19 (i.e. posters on doors)?

- No due to limited operation of libraries during the consultation period.

<ul style="list-style-type: none">Local Development Scheme out of date (dated June 2019).	<ul style="list-style-type: none">Website has been kept up to date with changes to timetable due to Covid-19 to keep residents up to date.Revised LDS December 2020 however the Council's website has been kept up-to-date with timetable information
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Strategic Housing and Employment Land Availability Assessment (SHELAA)

Number of comments received

Total: 2 **Support: 0** **Object:2** **Neutral:0**

Comments

- SHLAA assessment undertaken on the blanket basis that it is C3 housing. This should be revisited (786 – Strutt and Parker)
- SHELAA assessments have not been corrected when notified of errors (1243 – K Griffiths, landowner)

MSDC Response

- Whilst not distinction between C2 or C3 housing is made in the SHELAA assessment. As set out in DP30: Housing Mix sites that are considered suitable for housing development would be positively suitable for older person accommodation. Therefore no need to draw a distinction in the SHELAA.
- SHELAA has been undertaken in a robust manner, all sites have been assessed in a consistent way. SHELAA has been prepared using best practice methodology and in accordance with planning guidance.

Viability Assessment

Number of comments received

Total: 1 **Support: 0** **Object:1** **Neutral:0**

Comments

- No updated viability appraisal has been carried out, it cannot be concluded that the DPD is effective or consistent with National Policy (705 – Nexus_Miller Homes).

MSDC Response

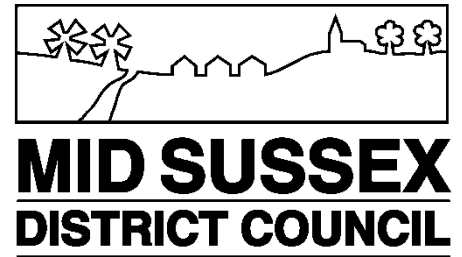
- A viability assessment of the sites was prepared in 2019 (IV2) prepared. It is informed by the Community Infrastructure Levy and district Plan Viability Study (2016) (IV3).
- As advised by the council's viability consultant: The sites DPD does not seek to introduce any new policies or a notably different range of sites to those in the District plan – therefore a more detail viability assessment is not required.

Transport Evidence			
Number of comments received			
Total: 5	Support: 0	Object:4	Neutral:2
Comments		MSDC Response	
<ul style="list-style-type: none"> The Parish believes that the Plan has not adequately addressed the cumulative impact on local roads of the proposed developments around in East Grinstead, Crawley Down and Ardingly. (206 - West Hoathly Parish Council) 		<ul style="list-style-type: none"> The Strategic Transport model (2020) has been prepared to inform plan preparation and ensure transport impacts are mitigated. This takes into account existing and proposed development in Mid Sussex and adjacent local authority areas The (Systra) Strategic Transport Assessment (T7) assessed the cumulative impacts and identified no remaining 'severe' impacts at any of the junctions in the vicinity of these areas. 	
<ul style="list-style-type: none"> Necessary to consider the increased traffic and the subsequent impacts on the character and tranquillity for the village of Ditchling (777 - South Downs National Park Authority) 		<ul style="list-style-type: none"> The council has worked with East Sussex as highway authority to understand any impacts on East Sussex highway network including Ditchling. This work is ongoing as set out in the SoCG with the South Downs National Park (DC11). 	
<ul style="list-style-type: none"> Capacity studies should take place on all major junctions from M23 J10 eastbound until its junction with A22 (625 - Worth Parish Council) 		<ul style="list-style-type: none"> As Set out in the supporting text to SA35 the A262/A22 is subject to a separate piece of work in partnership with West Sussex County Council, Surrey County Council and Tandridge District Council. 	
<ul style="list-style-type: none"> Junction capacity on the local road network at the Turners Hill crossroads and the Sandy Lane, Vicarage Road and Wallage lane junctions with the Turners Hill Road through Crawley down needs to be considered (625 - Worth Parish Council). 		<ul style="list-style-type: none"> The (Systra) Strategic Transport Assessment (T7) does identify junctions on the highway network that will be impacted by the Sites DPD and mitigation is required where necessary. 	
<ul style="list-style-type: none"> Council has concerns as to the soundness of the plan having considered the transport studies. Specifically the capacity of A262/A22 junctions as indicated in the Systra report and the WSP report published on Tandridge Council Web Site (666_ - East Grinstead Town Council) 		<ul style="list-style-type: none"> The (Systra) Strategic Transport Assessment (T7) has been prepared to inform plan preparation and ensure transport impacts are mitigated. The WSP report is a separate piece of work exploring strategic/ cross boundary transport matters. 	
<ul style="list-style-type: none"> (At time of regulation 19) Transport Evidence has not been completed we are therefore submitting a 'holding objection'. These relate to the migration of the Science and Technology Park and Safety Audit. (792 – West Sussex County Council) 		<ul style="list-style-type: none"> Since the publication of the Submission plan officers have continued to work with West Sussex County Council and Highways England in relation to the outstanding highways matters. Further information can be found in TP3 Introduction to Site Allocations DPD. 	

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Appendix D

Mid Sussex



Site Allocations DPD
Sustainability Appraisal
(Incorporating Strategic Environmental
Assessment)

Main Modifications Addendum

November 2021

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Site Allocations DPD Sustainability Appraisal – Main Modifications November 2021

1. Introduction and Background

1.1. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”¹. It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:

- **Social**
- **Environmental**
- **Economic**

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

1.2. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires Development Plan Documents (DPDs) to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of the Site Allocations DPD (Sites DPD) – promoting sites, strategy or policy that is sustainable, and ruling out sites, strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Sites DPD, whilst documenting how the plan meets the legal and policy requirements. The SA report also contains the elements required by the Strategic Environmental Assessment (SEA) directive as set out in the European Directive 2001/42/EC, adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.

The Sustainability Appraisal Report

1.3. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development of different options for site allocations in the Sites DPD as well as any generic policies that the document may contain. The findings of this work have been taken into consideration in determining the content of the Sites DPD and are documented within this report. This process will be repeated at all formal stages of the Sites DPD.

1.4. The Sustainability Appraisal process, along with the Strategic Environmental Assessment process, has widened the range of issues and options considered in formulating the proposals for the Sites DPD, in particular by focussing attention on the need to consider a range of potential social, economic and environmental effects. In turn, this has enabled the most sustainable policy approaches to be identified for inclusion within the Sites DPD.

¹ The Report of the Brundtland Commission, 1987

- 1.5. A Sustainability Appraisal Report accompanied both the Regulation 18 and Regulation 19 versions of the Sites DPD. These were submitted to the Planning Inspectorate alongside the Sites DPD and supporting evidence in December 2020.
- 1.6. The Sites DPD was subject to public hearings in June 2021. Following the hearings, the Inspector suggested a range of Main Modifications which would be necessary for the Sites DPD to be found 'sound'. The Sustainability Appraisal process is an iterative one – this version of the SA assesses the sustainability implications of the Main Modifications.
- 1.7. The Main Modifications, and this Sustainability Appraisal are subject to consultation.

How to Comment on This Report

- 1.8. The Site Allocations DPD, along with the accompanying Sustainability Appraisal report, will be made available for public consultation. All comments received on both of these reports will be taken into consideration before adoption of the Sites DPD.
- 1.9. If you wish to comment on these documents, these should be sent to:

Email:

PolicyConsultation@midsussex.gov.uk

Online:

www.midsussex.gov.uk/SitesDPD

Post:

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

2. Site Allocations DPD: Sustainability Appraisal Context and Methodology

- 2.1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The District Plan shapes the future of Mid Sussex by providing a framework for new development, employment growth, infrastructure, and measures to protect the countryside and other valuable assets. The District Plan was accompanied by its own Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to ensure the Plan was the most sustainable given all reasonable alternatives.
- 2.2. The Mid Sussex District Plan identified:
 - A total housing need of 16,390 homes for the period 2014-2031; inclusive of a contribution towards meeting unmet housing need in neighbouring authorities (policies **DP4**: Housing and **DP6**: Settlement Hierarchy)
 - Strategic Housing Allocations at Burgess Hill (**DP8 – DP9**), Hassocks (**DP11**) and Pease Pottage (**DP10**)
 - A total of 25ha employment space (policy **DP1**: Sustainable Economic Development).
- 2.3. Whilst the majority of the housing need has been planned for within the District Plan (either through completions, committed sites (those with allocations of planning permission) or the strategic sites listed above), there is a residual housing need.
- 2.4. Policy **DP4: Housing** identifies this 'residual need' and commits the Council to preparing a Site Allocations DPD in order to allocate sufficient sites to meet it. The DPD is also able to identify sites for other uses, such as employment, to meet any remaining need that was not identified within the District Plan.
- 2.5. The residual housing need figure has now been updated (as at 1st April 2021), and shows that the Site Allocations DPD will be required to plan for a minimum of 797 dwellings. The employment need position has also been updated, to take account of up-to-date employment forecasts and any changes since the District Plan was adopted. This work identifies a need for an additional 10-15ha of employment land.
- 2.6. The District Plan sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:
 - i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - iv) to set out additional Strategic Policies necessary to deliver sustainable development.
- 2.7. The purpose of the Site Allocations DPD is therefore to plan for a minimum of 797 dwellings and 10-15ha of employment land by allocating sufficient sites.

Methodology

- 2.8. To undertake a Sustainability Appraisal of the Site Allocations DPD, the council collected data about the district on social, environmental and economic issues. This is known as the 'baseline' and is documented in section 3 of the Regulation 18 and Regulation 19 main reports. This information enables the current (and potential future) social, environmental and economic issues facing the district to be established. The baseline consists of quantitative data as well as qualitative data – a review of all plans, programmes and policies that impact upon the Site Allocations DPD was also established to form a picture of the issues and challenges facing the district.
- 2.9. From this information, it was possible to identify sustainability objectives that the emerging policy options within the Site Allocations DPD would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts from policies to be quantified and monitored in the future.
- 2.10. The report accompanied the Regulation 18 Site Allocations DPD and was subject to consultation. Comments received during the consultation have been considered in preparing this Regulation 19 report. This also builds upon an earlier 'Scoping Report' which set out the baseline and proposed objectives and indicators. In accordance with regulations, this document was subject to a 5-week consultation with statutory environmental bodies and their comments were taken into account when drafting the Regulation 18 Sustainability Appraisal.

Current Sustainability Issues

- 2.11. From the examination of the baseline data and plans, programmes and policies that could influence the Site Allocations DPD it was possible to identify the current sustainability issues faced by the district. These issues are summarised as follows:

Social

- an increasing population, and the need for additional infrastructure² capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- existing school capacity issues will need to be addressed
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and

² Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open space.

interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged

- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the District mostly in relation to access to local community services – this can create social exclusion.
- low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.
- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste. Recycling rates are increasing.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts on traffic and environmental quality. Whilst it is recognised that commuters make a significant financial contribution to the District, it is important that appropriate employment opportunities are promoted within the District to ensure people who live locally can work locally.
- The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained
- There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems.
- The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.

Sustainability Framework – Objectives and Indicators

2.12. By taking the above issues it was possible to identify sustainability objectives for the district. These objectives were used to assess how the various policy options (known as 'reasonable alternatives') being explored for the Site Allocations DPD would contribute to the objectives of sustainability. The set of indicators could also be used to devise a monitoring framework for assessing how the policy proposals affect the objectives upon adoption of the Site Allocations DPD.

2.13. A total of 16 Sustainability Objectives were devised:

SOCIAL

- | | |
|----------|--|
| 1 | To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford |
| 2 | To improve the access to health, leisure and open space facilities and reduce inequalities in health. |
| 3 | To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities. |
| 4 | To improve access to retail and community facilities. |
| 5 | To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities. |

ENVIRONMENTAL

- | | |
|-----------|---|
| 6 | To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), thereby minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA) |
| 7 | To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance. |
| 8 | To conserve and enhance the District's biodiversity. (SEA) |
| 9 | To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA) |
| 10 | To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA) |

11	To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)
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12	To increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal
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13	To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)
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ECONOMIC

14	To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.
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15	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.
-----------	---

16	To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.
-----------	--

Developing and Appraising Options – “Reasonable Alternatives”

2.14. In preparing the Site Allocations DPD, a number of options were considered, and a range of options for each policy area were identified – these are referred to in the guidance as ‘reasonable alternatives’. As the aim of the DPD is to allocate sufficient housing and employment sites in order to meet the identified need, the majority of the Sustainability Appraisal report focuses on the strategy options and site options for allocation. There are also a number of other policies, which have been identified as needed to support the allocation of sites. Reasonable alternatives for these have also been tested through the appraisal process.

2.15. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified.

2.16. The preferred policy option from all of the options appraised has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the ‘preferred option’. In order to record the sustainability of the varying options, a range of colours and symbols has been used:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
?	Uncertain or unknown impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

Table 1: Appraisal Impact scoring method

- 2.17. All of the reasonable alternatives were appraised using these symbols, against the methodology outlined in section 2 of the main report. Once appraised, mitigation for any predicted negative impacts has been identified.
- 2.18. The majority of the Site Allocations DPD sites and policies were generally found to impact positively on the social, environmental and economic objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated by one of the policies within the adopted District Plan or could be mitigated by including policy requirements on individual sites.

3. Main Modifications

- 3.1. The Sustainability Appraisal is an iterative process. It is not intended to repeat previous Sustainability Appraisal work and findings within this report as that information is available within the Regulation 18 and regulation 19 (submission) versions of the SA which are within the examination library.
- 3.2. The purpose of this report is to assesses the sustainability implications of the Main Modifications suggested by the Inspector to ensure soundness of the Sites DPD. It is assumed that previous findings are still valid, unless demonstrated otherwise by the exercise undertaken within this report.
- 3.3. The Inspector will take account of the SA and comments received from consultation in producing his final report to the Council.

Main Modifications: Sustainability Appraisal Approach

- 3.4. Many of the proposed changes/modifications to the Sites DPD are minor with regard to significance for the SA process; they are generally concerned with correcting errors, addressing omissions, providing more clarity to policy wording, and updating of information. Therefore, it might be that the Main Modifications have no implications on the findings of the previous (Regulation 19) SA.
- 3.5. The proposed Main Modifications have therefore been screened for their significance with regard to SA – in other words, do the changes, deletions and additions significantly affect the findings of the Submission SA Report and/or do they give rise to significant environmental/sustainability effects?
- 3.6. A pragmatic and proportionate approach was taken, as relevant to this stage of plan-making and assessment. A professional judgment was made for SA significance taking into account the proposed change within the Main Modification and using the same method and SA Framework as the previous SA work, thus providing continuity and consistency of process.

Main Modifications: Conclusion

- 3.7. The results of the screening exercise are set out in **Appendix 1**.
- 3.8. The screening for SA significance identified that most Main Modifications (MMs) do not significantly affect the findings of the previous SA Report (Regulation 19 – Submission: July 2020), nor do they give rise to significant environmental effects.
- 3.9. The requirement for refreshed or new sustainability appraisal of some MMs was identified and the findings are summarised as follows:
 - **Main Modification 1: SA25: Land west of Selsfield Road, Ardingly**
This proposed modification reduces the yield from the site from 70 dwellings to 35. This respects the conclusion reached by the Inspector that 70 dwellings in this location would be considered ‘major development’ in the AONB whereas 35 would not.

As the change in yield represents a reasonable alternative option not yet appraised, a new appraisal has been carried out within Appendix 2.

The findings of the revised appraisal find the new option (yield of 35) is likely to have a reduced negative impact on the objective concerned with AONB – Objective 8: Countryside.

- **Main Modification 3: New Policy: Older Persons Accommodation (C2)**

Following the hearing sessions, the Inspector concluded that an additional policy was required on this subject. The new policy would provide support for such uses as long as certain requirements are met.

As this option had not been appraised previously, a new appraisal has been carried out within Appendix 2. The appraisal finds that there are more likely to be positive effects by having such a policy, particularly against the social objectives.

- 3.10. Overall, the results of the screening exercise and additional policy appraisals demonstrate that none of the modifications are likely to alter the original SA findings at Regulation 19/Submission stage (apart from where stated), and where SA findings are altered, they do not give rise to any significant negative environmental impacts. In general, the Main Modifications are more likely to have positive impacts against the SA objectives as a whole by comparison to the results at Regulation 19/Submission stage.

4. Next Steps

- 4.1. Proposed Main Modifications (MMs) have been made to the Site Allocations DPD following examination hearings. These MMs are required to make the Sites DPD sound and capable of adoption. Most changes to the Sites DPD are concerned with correcting errors, addressing omissions, updating, and providing clarity.
- 4.2. As part of the iterative and ongoing SA process, the proposed Main Modifications were screened for their significance with regard to the SA process and any likely significant effects.
- 4.3. The Main Modifications and accompanying evidence, including this SA Report, will be subject to public consultation. Any representations received will be taken into account by the Inspector in his final considerations of the soundness of the Sites DPD. When the Sites DPD is found sound, it will be adopted, and a SA/SEA Adoption Statement will be prepared in accordance with statutory requirements.

Appendix 1 – Screening of Main Modifications: Sustainability Implications

MM Ref	DPD Section	Proposed Change	Does this Main Modification significantly affect the findings of the Submission Sites DPD SA (July 2020) or do they give rise to significant environmental effects?
MM1	Policy SA25, page 73	<p><i>Modify policy SA25: Land West of Selsfield Road, Ardingly, for 70 dwellings, as follows:</i></p> <p>Number of Units: 70 35 dwellings.</p> <p><i>Under Urban Design Principles:</i> <i>New first bullet point:</i></p> <ul style="list-style-type: none"> • Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end. <p><i>Amend Policies Map and SA10/SA11 (with figures as at 1st April 2021) to reflect this modification.</i></p>	<p>This site option was appraised at Regulation 18 stage with a yield of 100 dwellings – this gave rise to potential very negative (--) impacts on Objective 9 – “Countryside” due to the sites location within the High Weald AONB and impact on it as the Council concluded that the site was ‘major’ development at this scale.</p> <p>At Regulation 19 stage, the yield reduced to 70 dwellings. The Council concluded that this was not ‘major development’ therefore the impact against Objective 9 was likely to be lower (concluded as negative (-)).</p> <p>The Inspector’s justification for this Main Modification is that a yield of 70 would likely be ‘major’ development. This would therefore re-instate the impact against Objective 9 to very negative (--). The Inspector suggests that a modification that reduces the yield to 35 and amends the site boundary is not likely to be ‘major’.</p> <p>Conclusion: As this is likely to affect the findings of the SA since the Submission version, this policy has been re-appraised in Appendix 2.</p>

MM2	Policy SA20, page 59	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Social and Community:</i> Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.</p> <p><i>The area for the older persons' dwellings needs to be defined on the Policies Map.</i></p>	<p>Submitted policy SA20 includes the requirement to provide accommodation for older persons (use class C2). The appraisal scored Very Positive (++) against Objective 1 – Housing.</p> <p>This modification simply specifies the amount and location of C2 accommodation within the site boundary.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM3	New policy to address the need for specialist accommodation for older people and care homes	<p><i>Include new criteria based policy to provide for specialist accommodation for Older People and Care Homes within Mid Sussex, as follows:</i></p> <p>There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Housing and Economic Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) at 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.</p> <p>Proposals for specialist accommodation for older people and care homes will be supported where:</p>	<p>Further to debate at the hearings in relation to an additional policy for older persons accommodation (Use Class C2), the Inspector has concluded that an additional policy is required in order to address this issue.</p> <p>Conclusion: This is a new policy proposed for inclusion within the SA since the Submission version, reasonable alternatives for this policy have been appraised in Appendix 2.</p>

		<p>a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood Plan; or</p> <p>b) It forms part of a strategic allocation; or</p> <p>c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or</p> <p>d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (policy DP4).</p> <p>In all circumstances, the site must be accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. Proposals must demonstrate how reliance on the private car will be reduced and be 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, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.</p>	
MM4	Policy SA13, page 43	<p><i>Modify policy SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill, for 300 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects responds to the setting of the South Downs National Park in its design, creating <p><i>Under Landscape Considerations:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts 	<p>Submitted policy SA13 already includes requirements related to the setting of the South Downs National Park, the Main Modification proposed gives more clarity to this requirement.</p> <p>The submitted policy also contains the requirement for a Landscape and Visual Impact Assessment to be prepared to support an application inform site layout, capacity and mitigation. During the hearings, an additional piece of work related to Opportunities and Constraints was prepared. The policy wording</p>

		<p>on the most visible parts of the site on the wider countryside and the setting of and any potential views from the South Downs National park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect the dark night skies.</p> <ul style="list-style-type: none"> • The LVIA will incorporate the findings of the Opportunities and Constraints Plan, paying particular attention to the increasing sensitivity moving through the site towards the south, and acknowledge its position as an edge of settlement development to Burgess hill that reflects the characteristics of its immediate area. The design will take account of and respond to the findings of the LVIA. 	<p>has been amended to refer to this, and to strengthen the role that the LVIA plays.</p> <p>Both amendments provide clarity and strengthening to the existing policy but do not materially change the policy in a way that would give alter the findings of the original SA. Similarly, it is not anticipated that any adverse environmental impacts would arise from the change – if anything, more positive impacts could be expected compared to the conclusion reached at Regulation 19 stage.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM5	Policy SA7, page 27	<p><i>Modify policy SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second bullet point:</i></p> <p>Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM6	Policy SA8, page 28	<p><i>Modify policy SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second Bullet Point:</i></p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within</p>

		Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.	the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects. Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM7	Policy SA23, page 67	<i>Modify policy SA23: Land at Hanlye Lane to the East of Ardingly Road, Cuckfield, for 55 dwellings, as follows:</i> <i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Cuckfield, which provides enhanced and accessible open space; respects the character of the village and conserves and enhances the setting of the High Weald AONB;	This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the setting of the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects. Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM8	Policy SA26, page 76	<i>Modify policy SA26: Land South of Hammerwood Road, Ashurst Wood, for 12 dwellings, as follows:</i> <i>Under Objectives:</i> <ul style="list-style-type: none"> To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and sits well within conserves and enhances the landscape and scenic beauty of the High Weald AONB <i>Under AONB:</i>	This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.

		<ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to protect conserve and enhance the landscape and scenic beauty of the High Weald AONB. 	Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM9	Policy SA27, page 78	<p><i>Modify policy SA27: Land at St Martin Close, Handcross, for 35 dwellings, as follows:</i></p> <p><i>Under Objectives, insert new first bullet point:</i> To deliver a high quality, landscape led, sustainable extension to Handcross, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM10	Policy SA28, page 80	<p><i>Modify policy SA28: Land South of The Old Police House, Birchgrove Road, Horsted Keynes, for 25 dwellings, as follows:</i></p> <p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM11	Policy SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this</p>

		<p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM12	Policy SA34, page 93	<p><i>Modify policy SA34: Existing Employment Sites</i></p> <p><i>After first paragraph, insert the following text:</i></p> <p>Development proposals outside the traditional employment use classes 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:</p> <ul style="list-style-type: none"> (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. <p>Development proposals outside the traditional employment use classes 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 causes, or would lead to site-specific, environmental</p>	<p>The Main Modification adds additional requirements in relation to demonstrating continued viable use of the site. If this can not be demonstrated, non-employment generating uses will be supported. This provides some added flexibility.</p> <p>The Submission appraisal concluded that very positive (++) impacts would be expected for the employment objectives 15 – Employment and 16 – Economic Growth.</p> <p>Whilst the main modification could reduce the strength of the policy in protecting existing employment uses, it is not likely to significantly alter the conclusions reached in the original SA.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

		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.	
MM13	Policy SA35, page 96	<p><i>Modify policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, as follows:</i></p> <p><i>Amend fifth paragraph as follows:</i> New development in these areas should be carefully designed, having regard to matters such as building layout, noise insulation, landscaping, the historic environment, and means of access and meeting the requirement for biodiversity net gain.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal. Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they are only likely to be positive.</p>
MM14	Policy SA37, page 103	<p><i>Modify policy SA37: Burgess Hill/Haywards Heath Multifunctional Network, as follows:</i></p> <p><i>Under third paragraph as follows:</i> The area shown on the Policies Map illustrates where policy SA37 will apply; the precise alignment for the scheme will be informed by detailed design work and it should be carefully designed having a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal.</p>

			<p>Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they are only likely to be positive.</p>
MM15	Appendix B, page 141	<p><i>Modify Appendix B by inserting additional table, as set out below in Appendix 1, after the following text:</i></p> <p>The Council has identified some of the additional information it intends to record if it is available.</p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM16	Housing Trajectory	<p><i>Include the Council's updated housing trajectory within the Plan.</i></p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM17	Policy SA16, page 50	<p><i>Modify policy SA16: St Wilfrid's Catholic Primary School, School Close, Burgess Hill, for 200 dwellings, as follows:</i></p> <p><i>Under Urban Design Principles, at the end of the first bullet point, for 200 dwellings, insert:</i></p> <p>The anticipated yield of the comprehensive redevelopment scheme includes the 200 dwellings proposed in policy SA16, plus an additional 100 dwellings proposed in the Neighbourhood Plan for the Brow Quarter.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM18	Policy SA31, page 50	<p><i>Modify policy SA31: Land to the rear of Firlands, Church Road, Scaynes Hill, for 20 dwellings, as follows:</i></p> <p><i>Under Highways and Access, additional bullet point:</i></p>	<p>Submitted policy SA31 included a requirement to provide safe and convenient routes for pedestrians and cyclists. The modification</p>

		<p>Contribute towards provision of a footpath connecting the site to the existing footpath to the south. This could be done either as an extension to the Scaynes Hill Common footpath or exploring options for a formal footway alongside the carriageway.</p>	<p>strengthens this requirement and details potential options.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM19	SA14, page 46	<p><i>Modify policy SA14: Land to the South of Selby Close, Hammonds Ridge, Burgess Hill, for 12 flats, as follows:</i></p> <p><i>Under Highways and Access, first bullet point:</i> Provide access from Hammonds Ridge. or through CALA Homes development at Edwin Street to the west, the details of which need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM20	SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Highways and Access: Delete first bullet point and insert:</i></p> <ul style="list-style-type: none"> • Safe and convenient pedestrian and vehicular access needs to be secured, in accordance with Manual for Streets (MfS) to enable (a) satisfactory access by waste collection vehicles and emergency services vehicles; and (b) safe and convenient pedestrian access, both along Hamsland and into the proposed development. <p><i>Under Biodiversity and Green Infrastructure:</i> <i>Add new bullet point:</i> Ensure adequate protection of the existing trees along the site boundary.</p>	<p>Submitted policy SA29 included a requirement to investigate potential access. The modification strengthens this requirement and provides further details.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

MM21	SA22, page 65	<p><i>Modify policy SA22: Land North of Burleigh Lane, Crawley Down, for 50 dwellings, as follows:</i></p> <p><i>Under Highways and Access:</i> Provide access from Sycamore Lane or Woodlands Close. Detailed access arrangements will need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM22	SA20, page 61	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Biodiversity and Green Infrastructure:</i> Additional text at end of bullet point 6: The management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management.</p>	<p>This modification adds an additional requirement for monitoring of the SANG, including suggestions for how this could be achieved.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

Appendix 2 – Re-Appraisals / New Appraisals where Main Modifications alter previous SA findings

SA25: Land west of Selsfield Road, Ardingly			
Reasonable Alternatives for Assessment			
<p>A: Land west of Selsfield Road. SHELAA#832. Regulation 19 / Submission stage Units: 70.</p> <p>B: Land west of Selsfield Road. SHELAA#832. Main Modifications stage Units: 35.</p>			
Objective	A – Reg. 19 / Submission	B – Main Modifications	Assessment
1 - Housing	++	++	This site option makes a significant contribution towards the residual housing need and has demonstrated a reasonable prospect of deliverability.
2 - Health	-	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	0	This site option has no areas at risk from flooding, and has not suffered from flooding in the past.
7 - Land Use	-	-	This site option is on green field land.
8 - Biodiversity	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site.
9 - Countryside	--	-	This site is wholly within the High Weald AONB and has been assessed as having a moderate impact upon the landscape due to the scale of development. A previous scheme for 100 units was appraised at Regulation 18 stage as “- -” as it was concluded as ‘major development’ in accordance with NPPF paragraph 177 (and footnote 60). The Regulation 19 SA appraised the impact as negative (‘-’) as the yield had reduced to 70 dwellings and concluded as not major. However, the Sites DPD Inspector has assessed the site as being ‘major’ at this yield, therefore the appraisal now concludes a very negative impact (‘- -’). Option (b), at 35 dwellings, is not concluded as major and therefore a negative impact is expected.
10 - Historic	-	-	This site option has no constraints in terms of listed buildings, but has a less than substantial harm (low) on Ardingly Conservation Area.
11 - Transport	?	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.

12 - Energy/Waste	?	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓		
<p>This site performs relatively well against the SA framework. There is a 'Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact and may be reduced as a result of its reduced scale since originally assessed (Regulation 18 stage: 100 units and Regulation 19 stage: 70 units). As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.</p>			

Older Persons Accommodation

Reasonable Alternatives for Assessment

Option (a):

To have a policy that supports proposals that will contribute to meeting needs for older people and care homes. This will be supported where allocated, or within the built-up area boundary, or contiguous with the built-up area boundary. The site must be accessible by sustainable modes to local facilities and services, and a travel plan will need to be provided.

Option (b):

To not have a policy, and therefore rely on District Plan Policy **DP30: Housing Mix**.

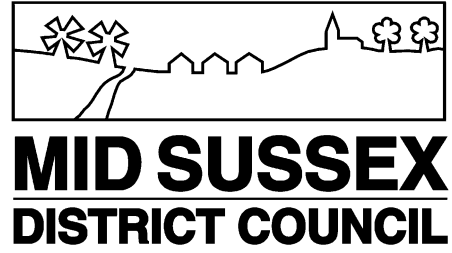
Objective	A	B	Assessment
1 - Housing	++	+	Both options (a) and (b) are likely to have a positive impact on this objective, as both provide the flexibility to allow for these uses. However, option (a) provides greater clarity by providing explicit support as long as certain requirements are met.
2 - Health	+	0	Option (a) provides support for older persons, particularly those requiring care. This is therefore likely to have a positive impact on health. Option (b) does not preclude this, and provides policy support, however as option (a) provides explicit support it is more likely positive impacts could arise.
3 - Education	0	0	Neither option has an identified impact upon the sustainability objective for education.
4 - Retail	0	0	Neither option has an identified impact upon the sustainability objective for retail.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for communities.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	0	0	Neither option has an identified impact upon the sustainability objective for land use.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	0	0	Neither option has an identified impact upon the sustainability objective for countryside.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for historic environment.
11 - Transport	+	0	Option (a) is stronger in its requirement for the site to be sustainably and accessibly located, and provides certain requirements in relation to travel plans and sustainable transport modes.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	?	?	There may indirect benefits to watercourses by improving air quality in the District.
14 - Regeneration	0	0	Neither option has an identified impact upon the sustainability objective for regeneration.
15 - Employment	0	0	Neither option has an identified impact upon the sustainability objective for employment.

16 - Ec. Growth	0	0	Neither option has an identified impact upon the sustainability objective for economic growth.
Summary of Appraisal:			
Both options (a) and (b) provide support (with caveats) for older persons accommodation. However, as option (a) is more explicit in its support and recognises a need for such accommodation, it is likely that more positive impacts could arise. In particular, social objectives (1) and (2) are likely to receive more positive outcomes with option (a) in place. In addition, option (a) provides certain requirements related to sustainable travel which is not present in DP30: Housing Mix (option (b)) and therefore more positive impacts are expected against this objective.			
Cross-Border Impacts:			
There are no cross-border impacts likely to arise from this policy.			
Recommendations and Mitigation Measures:			
None suggested			
Preferred Option:	A		

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Appendix E

Mid Sussex



Site Allocations DPD
Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)

Adoption

June 2022

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1. Introduction

The Sustainability Appraisal Report

- 1.1. This document comprises the Regulation 19 Sustainability Appraisal (incorporating a Strategic Environmental Assessment – SEA) for the Mid Sussex Site Allocations Development Plan Document (DPD). This is the third step that is undertaken when preparing a Sustainability Appraisal and/or Strategic Environmental Assessment, following publication of the Scoping Report in May 2019 and Regulation 18 version in September 2019.
- 1.2. The Site Allocations DPD is a daughter document to the Mid Sussex District Plan, which was adopted in March 2018. The District Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved, covering the period up to 2031. The District Plan sets out the district’s housing and employment requirements. Whilst the majority of this requirement has already been planned for, there is still a residual need that must be found – the role of the Site Allocations DPD is to allocate sufficient housing, employment and other sites in order to ensure the need identified in the District Plan is met.
- 1.3. A Sustainability Appraisal and SEA Report accompanies DPDs and is prepared at every key stage of the DPD process in order to demonstrate that the plan being prepared is the most sustainable given all realistic alternatives. The purpose of the Regulation 19 Sustainability Appraisal is to appraise all reasonable alternatives for policies and site options, in order to determine the most sustainable given all other options. It does this by appraising all reasonable alternatives against Social, Environmental and Economic objectives, which were established in the Scoping Report.
- 1.4. This document contains the following tasks:
 - **Section 2** – Background and Methodology
 - **Section 3** – Context and Baseline: Identifying other Plans and Programmes (A1), Collecting Baseline Information (A2)
 - **Section 4** – Identifying Sustainability Issues and Problems (A3)
 - **Section 5** – Sustainability Framework: Developing the Sustainability Appraisal / SEA Objectives (A4)
 - **Sections 6 – 9** – Appraisal of Housing, Employment and Generic Policies
 - **Section 9** – Conclusions
 - **Section 10** – Next Steps
- 1.5. During examination of the Site Allocations DPD, the Inspector suggested a number of Main Modifications that would be required to ensure the plan was sound. These were appraised in a Main Modifications Sustainability Appraisal which was consulted upon alongside the Main Modifications in November 2021 – January 2022. As the SA is an iterative process, this version of the SA only looked at the Main Modifications and should be read alongside the rest of the SA. The Main Modifications version of the SA is included at **Appendix 5**.

2. Background and Methodology

Mid Sussex Planning Context

- 2.1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The District Plan shapes the future of Mid Sussex by providing a framework for new development, employment growth, infrastructure, and measures to protect the countryside and other valuable assets. The District Plan was accompanied by its own Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to ensure the Plan was the most sustainable given all reasonable alternatives.
- 2.2. The Mid Sussex District Plan identified:
 - A total housing need of 16,390 homes for the period 2014-2031; inclusive of a contribution towards meeting unmet housing need in neighbouring authorities (policies **DP4**: Housing and **DP6**: Settlement Hierarchy)
 - Strategic Housing Allocations at Burgess Hill (**DP8 – DP9**), Hassocks (**DP11**) and Pease Pottage (**DP10**)
 - A total of 25ha employment space (policy **DP1**: Sustainable Economic Development).
- 2.3. Whilst the majority of the housing need has been planned for within the District Plan (either through completions, committed sites with existing allocations of planning permission, or the strategic sites listed above), there is still a residual housing need still to be planned for. Policy **DP4: Housing** identifies this ‘residual need’ and commits the Council to preparing a Site Allocations DPD in order to allocate sufficient sites to meet it. The DPD is also able to identify sites for other uses, such as employment, to meet any remaining need that was not identified within the District Plan. The residual need figure has now been updated, and is discussed in more detail in section 6 of this report.

What is Sustainable Development?

- 2.4. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”¹. It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:
 - Social
 - Environmental
 - Economic

Sustainability and the National Planning Policy Framework

- 2.5. The National Planning Policy Framework (NPPF) was published in February 2019, superseding the previous 2012 version.
- 2.6. The NPPF states the Government’s intentions with regards to sustainable development, in particular the need for the planning system to perform a number of overarching objectives:
 - **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

¹ The Report of the Brundtland Commission, 1987

- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 2.7. Paragraph 9 of the NPPF states that these objectives should be delivered through the preparation and implementation of plans and the application of policies within the NPPF, and that planning policies should play an active role in guiding development towards sustainable solutions. Paragraph 10 confirms that the heart of the NPPF is the presumption in favour of sustainable development.
- 2.8. The NPPF is accompanied by Planning Practice Guidance (PPG), updated regularly. This provides more detail on how to implement the policy within the NPPF. Included within this is guidance on how to undertake Sustainability Appraisal and/or Strategic Environmental Assessment, which will be followed throughout this process.

Sustainability Appraisal and Strategic Environmental Assessment

Sustainability Appraisal (SA)

- 2.9. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the Site Allocations DPD to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of Local Development Documents such as the Site Allocations DPD – promoting strategy or policy that is sustainable, and ruling out strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Site Allocations DPD, whilst documenting how the plan meets the legal and policy requirements.

Strategic Environmental Assessment

- 2.10. Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.
- 2.11. The SEA process is very similar to the Sustainability Appraisal process. The key difference is that it is only concerned with environmental impacts as opposed to social and economic impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive’s requirements.
- 2.12. Best practice suggests incorporating the SEA process into the Sustainability Appraisal due to their similarity in aim and methodology. This enables social, environmental and economic effects to be considered together in order to document the full picture of sustainability and to show a holistic outcome. Planning Practice Guidance states that “where the [SEA] Directive applies there are some specific requirements that must be complied with and which, in the

case of Local Plans, should be addressed as an integral part of the sustainability appraisal process².

2.13. This Sustainability Appraisal will therefore include the elements required by the SEA Directive. Where practical, it will be signposted throughout the document where the requirements have been met, and what elements relate to SEA specifically. For simplification, the rest of this report and future stages will be referred to as the Sustainability Appraisal report, however it incorporates SEA.

2.14. The SEA Directive sets out a legal assessment process that must be followed. In order to demonstrate compliance with the Directive, the table below indicates how the SEA Directive’s requirements will be met during the Sustainability Appraisal process for the Site Allocations DPD.

The SEA Directive’s Requirements ³	Where Covered in the Sustainability Appraisal Process
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans or programmes	Section 2 – “Background and Methodology” Appendix 1 – “Review of PPSGIs”
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 3 – “Context and Baseline”
c) The environmental characteristics of areas likely to be significantly affected	Section 3 – “Context and Baseline” Section 4 – “Identifying Sustainability Issues and Problems”
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4 – “Identifying Sustainability Issues and Problems”
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 5 – “Sustainability Framework”
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Sections 6 (Housing), Section 7 (Employment), Section 8 (Generic Policies), Appendix 4 (Housing Site appraisals)
g) The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Within individual appraisals in Sections 6-9
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Within individual appraisals in Sections 6-8, concluded within Section 9.
i) A description of measures envisaged concerning monitoring in accordance with Article 10	Appendix 2 “Sustainability Framework Baseline”

² National Planning Practice Guidance, Ref: 11-002-20140306

³ Derived from ‘Figure 1: The SEA Directive’s Requirement’ in “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005).

j) A non-technical summary of the information provided under the above headings	Published as a separate document
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Table 1 - Where SEA Directive Requirements are met

Consultation and Implementation

- 2.15. An important part of the Sustainability Appraisal process is consultation with Statutory Environmental Bodies (Historic England, Natural England and the Environment Agency), wider statutory consultees (as defined in the Council’s adopted Statement of Community Involvement) and members of the community.
- 2.16. The Scoping Report was consulted upon with the Statutory Environmental Bodies for a 5-week period. The responses to this consultation and how comments have been addressed by the Council, are documented in appendix 3.
- 2.17. The SEA Directive makes a number of requirements regarding consultation on the report. The table below shows where these requirements have or will be met in the future.

The SEA Directive’s Requirements	Where / When this will be Undertaken
Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report	Within the Scoping Report published in May 2019
Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme	The Sustainability Appraisal will be subjected to the same consultation arrangements at Regulation 18 and 19 as the Site Allocations DPD (noted in Section 1)
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making	The Environmental Report has informed preparation of the Site Allocations DPD.
When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed: <ul style="list-style-type: none"> - The plan or programme as adopted - A statement summarising how environmental considerations have been integrated into the plan or programme - The measures decided concerning monitoring 	Within this report and separate document
Monitoring of the significant environmental effects of the plan’s or programme’s implementation	Not applicable yet, the significant effects will need to be monitored in accordance with the monitoring arrangements in Section 10.

Table 2 - Where SEA Consultation Requirements are met

Undertaking Sustainability Appraisal

2.18. Undertaking Sustainability Appraisal (incorporating Strategic Environmental Assessment) is a five-stage process, as outlined in the SEA Guidance and Planning Practice Guidance⁴:

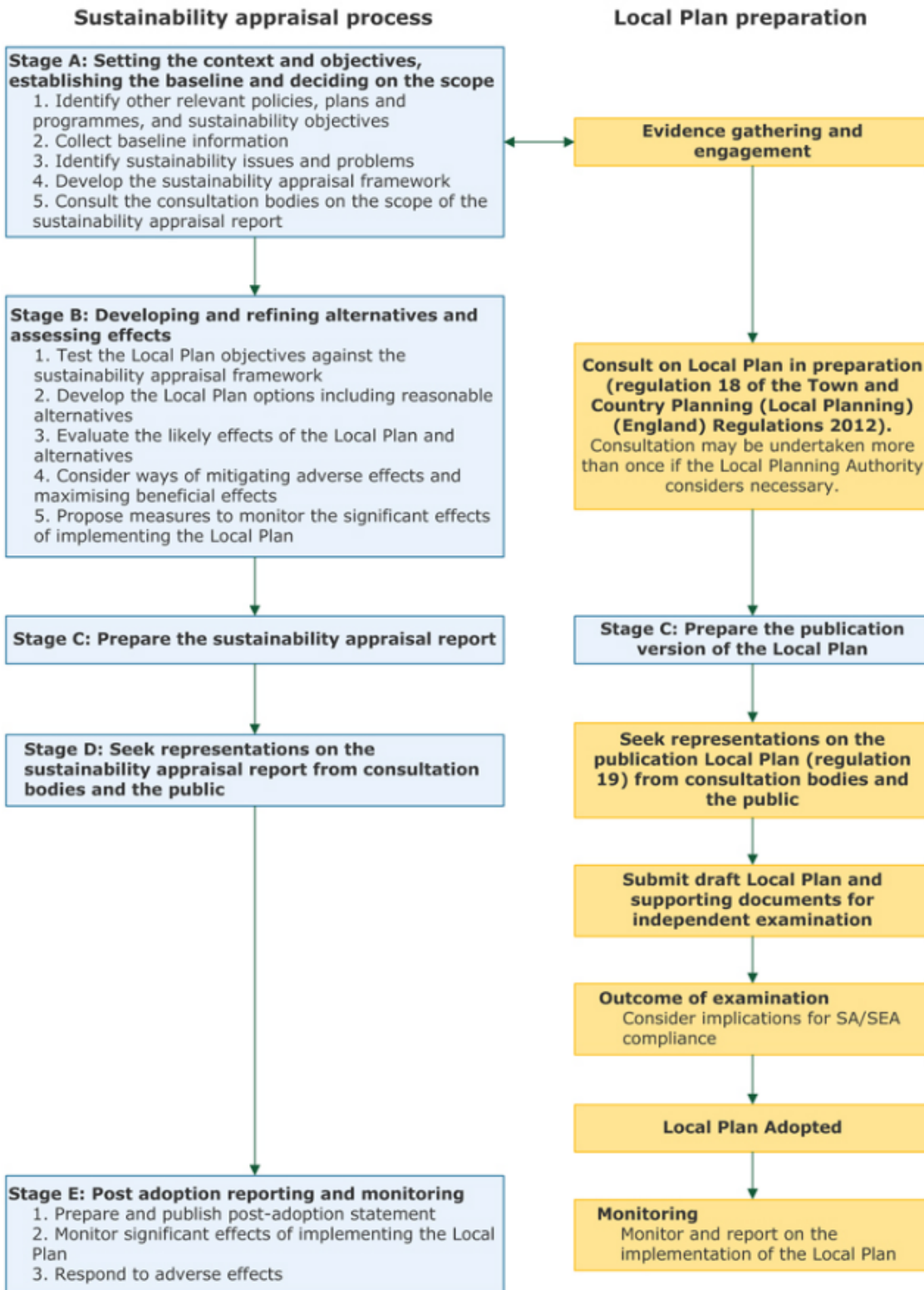


Figure 1 - Stages of the Sustainability Appraisal Process

⁴ “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), within Planning Practice Guidance (ID: 11-014-20140306)

Methodology for the Sustainability Appraisal

Stage A

- 2.19. The Scoping Report is the first stage of the Sustainability Appraisal process (**Stage A**) and documents the tasks required to be undertaken at this stage.
- 2.20. The Scoping Report outlines the baseline for the district – in other words, what the situation is ‘now’, pre-plan. It determined the current issues related to sustainability and developed a set of Sustainability Objectives to help address these issues.

Stages B, C, D

- 2.21. Stages B, C and D of the Sustainability Appraisal process are documented within this report and within Appendix 5 where it relates to Main Modifications.
- 2.22. The Regulation 18 Sustainability Appraisal Report built upon the evidence and Sustainability Objectives that have been identified within the Scoping Report (Stage A). Responses to the consultation on the Scoping Report were taken into account where appropriate – these comments predominantly relate to the baseline (section 3) and the Sustainability Objectives (section 4) and any relevant updates to these sections have been reported in this report (documented in Appendix 3) including revisions post Regulation 18, 19 and Main Modifications.
- 2.23. A range of options, known as ‘reasonable alternatives’, have been considered for the overall plan strategy, development sites and each policy in the plan. All reasonable alternatives will be ‘appraised’ against the Sustainability Objectives using the following notation:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
?	Uncertain or unknown impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

- 2.24. The scoring system (using a range between ‘++’ and ‘--’) is consistent with other Sustainability Appraisals undertaken by the District Council and is suggested as an appropriate method to take in the SEA guidance. The symbol chosen depicts the predicted impact/effect each reasonable alternative will have on each sustainability objective and to what extent, accompanied with explanatory text as justification. It will evaluate any cross boundary impacts (i.e. impacts outside Mid Sussex district) and suggest mitigation where necessary.
- 2.25. The main objective of appraising different options or alternatives is to assess the impact of each option with regards to sustainability, highlighting which of the options performs the best over Social, Environmental and Economic aspects. The option that has the most positive impact on the sustainability objectives should then be chosen as the option to be included within the Site Allocations DPD. This ensures that the plan on the whole is the most sustainable plan, given all reasonable alternatives and will therefore contribute to sustainable development.

3. A Profile of Mid Sussex - Context and Baseline

- 3.1. This section introduces the context of the Site Allocations DPD and the baseline information relating to Mid Sussex. The purpose of this section is to establish the current position with regard to Social, Environmental and Economic aspects (i.e. the baseline position) so that future impacts of strategy, policies and sites within the Site Allocations DPD can be predicted.
- 3.2. This exercise will help to identify any current sustainability issues and also predict where they could arise in the future – both with and without a plan in place. By understanding these issues, it will enable a range of “Sustainability Objectives” and accompanying indicators, known collectively as the Sustainability Framework, to be drawn up. It will be these objectives that all realistic alternatives will be measured against in the forthcoming draft Sustainability Appraisal report (i.e. Stages B, C and D of the process described in section 2).
- 3.3. The context and baseline is undertaken in two halves, as set out in the Strategic Environmental Assessment guidance:
 - Identifying Other Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the Site Allocations DPD
 - Collecting Baseline information

Task A1 - Identifying Other Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the Site Allocations DPD

- 3.4. A review of the other plans, programmes, policies, strategies, guidance and initiatives (PPPSGIs) that may influence the Site Allocations DPD was undertaken. This enables the plan to be read in context, so that any inconsistencies or constraints placed upon the plan by other plans can be understood. This review also highlights many useful sources of evidence – for example, the District Council’s Strategic Flood Risk Assessment and Landscape Character Assessment which can help to build a picture of the current baseline situation in Mid Sussex with respect to sustainability.
- 3.5. The PPPSGIs identified range from documents produced at an international level, right down to those produced locally. It should be noted that this is not an exhaustive list, however as many of the PPPSGIs as possible that could influence the development of the Site Allocations DPD are listed. The relevant PPPSGIs are listed in Appendix 1.

Task A2 - Collecting Baseline Information

- 3.6. The baseline provides the basis for predicting the impact that policies and strategy within the Site Allocations DPD will have now and in the future, and providing a base from which to monitor these effects in the future (a requirement of the SA process). It also helps identify any current sustainability issues - by understanding the situation now; it will be easier to draw up policies or alternatives that could address these issues. This will be the job of the Sustainability Appraisal report at the next stage.
- 3.7. The Baseline contains information for Social, Environmental and Economic aspects. Some information falls into more than one category (for example, employment – which is both social and economic) which should be borne in mind when drawing up sustainability objectives, and predicting impacts against these at the next stage.

Mid Sussex District

- 3.8. Mid Sussex District is located in South-East England within the county of West Sussex (Figure 2). The District is bordered by Wealden and Lewes to the east (within East Sussex

County), Brighton and Hove to the south, Tandridge to the north (in Surrey County). It is bordered by Crawley and Horsham to the west – Mid Sussex, Crawley and Horsham form the Northern West Sussex Housing Market Area (as defined in the Strategic Housing Market Assessment 2009 and all subsequent updates).

- 3.9. The District covers approximately 128 square miles (approximately 334 square kilometres) and is a largely rural District. There are three main towns – Burgess Hill, Haywards Heath and East Grinstead – as well as twenty-five villages and other smaller hamlets. A number of smaller villages within the south of the district are within the South Downs National Park which has its own planning authority (this area is therefore not covered by the District Plan or forthcoming Site Allocations DPD).

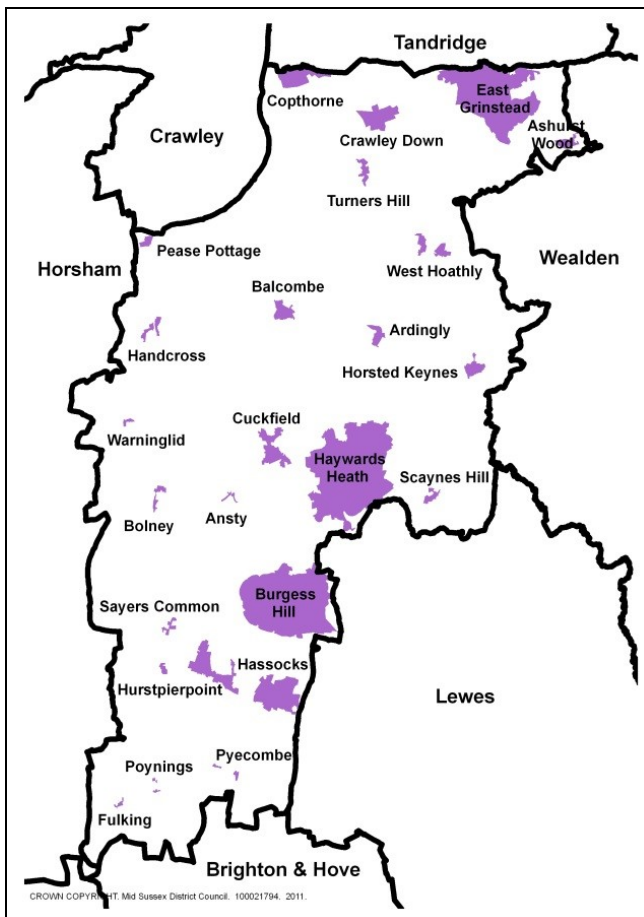


Figure 2 - The Location of Mid Sussex

Social Baseline

Human Characteristics

- 3.10. The population of Mid Sussex has grown steadily since 1981 when the population was 117,300 rising to 139,860 in 2011 (Figure 2), and approximately sixty percent live in the three main towns, each having a population of around 28,000 (Census, 2011).
- 3.11. The Mid Sussex District Plan sets the housing requirement for the district. The calculation of the housing requirement is based on demographic trends at a base level, which is then adjusted upwards to assist in improving affordability, and increased further where there is an unmet need for housing in neighbouring authority areas.

3.12. Demographic trends (based on the ONS Sub-National Population Projections data) suggested a housing requirement of 714 dwellings per annum (dpa). Adjustments for affordability increased this figure to 876dpa. Due to unmet housing need in Crawley borough, an additional 1,500 homes (214 dpa) are required from 2024/25 onwards, raising the housing requirement to 1,090dpa. The housing requirement for the District Plan period 2014-2031 is therefore:

- 876dpa for years 2014/15 – 2023/24
- 1,090dpa for years 2024/25 – 2030/31
- Average of 964dpa

3.13. As the amount of housing is in excess of baseline levels (714dpa), it will consequently lead to a higher future population than expected through the published ONS Subnational Population Projections. The Council have undertaken their own demographic modelling in order to best estimate future population levels and age profile.

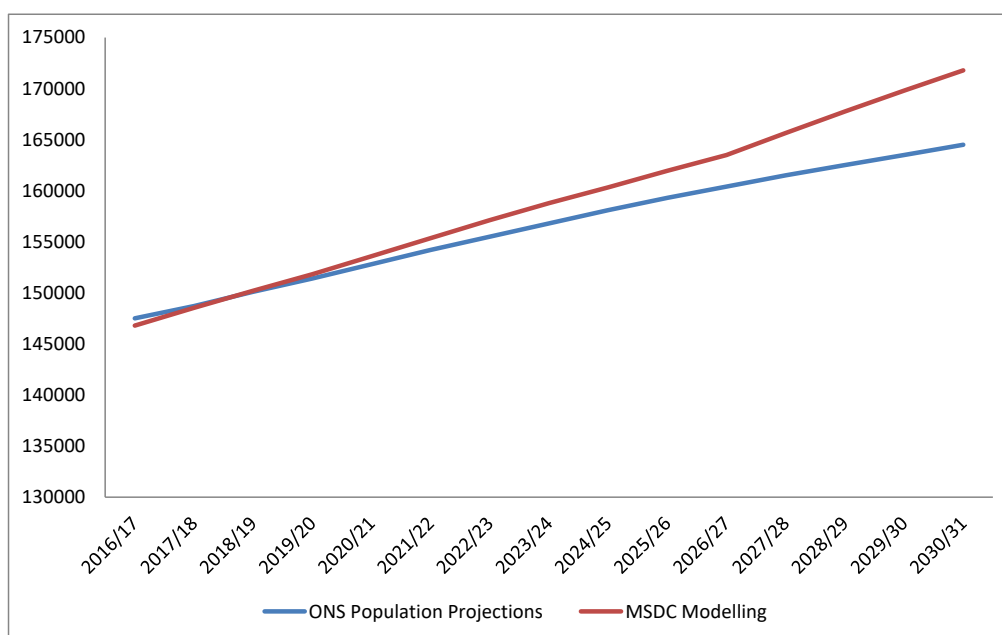


Figure 3 - Population Projections for Mid Sussex (ONS Subnational Population Projections (2016 Base) and MSDC Modelling)

- 3.14. Although the total population is projected to increase by 20.3% over this time, the working age population (16 - 64) is projected to increase by only 12.9% from 2014 to 2031. The working age population of Mid Sussex will account for 57.1% of the total population (60.9% at the start of the plan period).
- 3.15. Both nationally and in Mid Sussex the population is ageing – the age group 65+ is predicted to increase by almost 50% over the plan period, with an increase of 118% of those aged over 90. This pattern is not specific to Mid Sussex, as life expectancy is increasing nationally, however life expectancy in Mid Sussex is higher than the national average. Life expectancy is 81.4. This is slightly lower than figures for the South East (82.3) and slightly higher than the figures for England (81.3) (ONS, 2014), indicating a national issue as opposed to a local one.
- 3.16. The potential impact of an ageing population includes increased pressure on healthcare and social services as well as the possibility that if the working age population were to shrink then there might be gaps in the jobs market with businesses and public services lacking the workforce required. It is important that new and existing housing stock is suitable to meet the needs of households in the future including an aging population. Appropriate housing offers the potential to reduce expenditure on public services and promote older people's

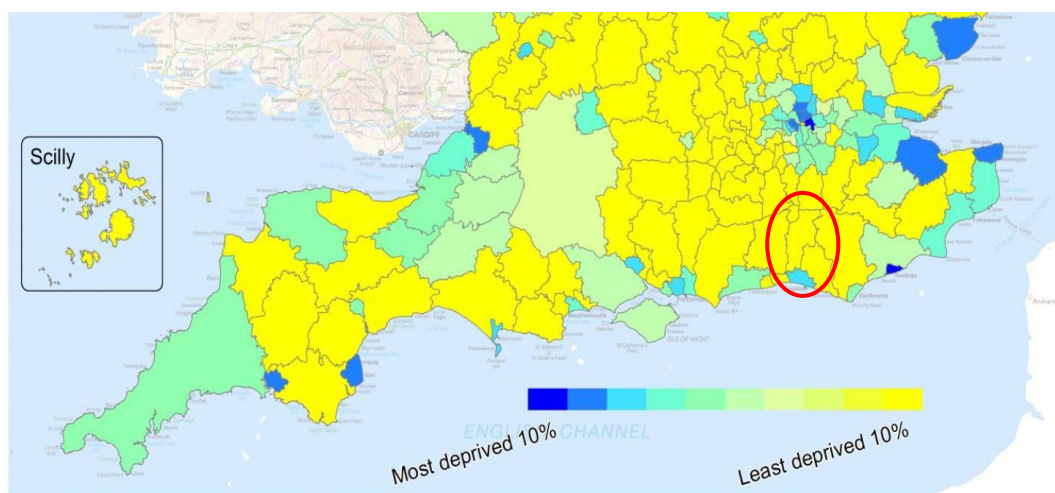
independence and wellbeing. It will also be important to ensure there are suitable employment opportunities to reduce out-migration of residents of working age.

AGE GROUP	2014	2031	% Change	% of 2014 Population	% of 2031 Population
0-4	8,695	8,940	2.8	6.0	5.1
5-9	8,970	10,135	13.0	6.2	5.8
10-14	8,561	10,636	24.2	5.9	6.1
15-19	8,554	9,930	16.1	5.9	5.7
20-24	6,172	7,049	14.2	4.3	4.1
25-29	7,304	7,860	7.6	5.1	4.5
30-34	8,409	8,973	6.7	5.8	5.2
35-39	9,153	10,984	20.0	6.3	6.3
40-44	10,819	11,901	10.0	7.5	6.9
45-49	11,341	11,688	3.1	7.9	6.7
50-54	10,601	11,107	4.8	7.3	6.4
55-59	9,022	10,716	18.8	6.2	6.2
60-64	8,277	11,099	34.1	5.7	6.4
Working Age (16-64)	87,867	99,161	12.9	60.9	57.1
65-69	8,816	10,631	20.6	6.1	6.1
70-74	6,270	8,839	41.0	4.3	5.1
75-79	4,984	7,430	49.1	3.5	4.3
80-84	4,055	7,195	77.4	2.8	4.1
85-89	2,697	4,960	83.9	1.9	2.9
90+	1,677	3,666	118.6	1.2	2.1
Older Population (65+)	28,499	42,722	49.9	19.7	24.6
TOTAL POPULATION	144,377	173,739	20.3	100.0	100.0

Table 3 - Age Profile of Mid Sussex. (MSDC modelling (POPGROUP) – 2018)

Living Standards

3.17. Mid Sussex benefits from a high standard of living. According to the Indices of Multiple Deprivation 2015, Mid Sussex District is one of the least deprived local authorities in the country; it ranks as 321 out of 326 (Figure 3). Whilst this indicates that Mid Sussex is not a deprived area, there are residents and communities in the District that find it difficult to access some services and facilities. In particular, Mid Sussex has a lower (more deprived) score on the health and disability, barriers to housing and services indicators, when compared to the income and education indicators.



Contains OS data © Crown copyright (2015)

Figure 4 - Indices of Multiple Deprivation (The English Indices of Deprivation 2015, ONS/DCLG)

House Prices

- 3.18. As Mid Sussex has a high standard of living and is an attractive place to live, there is a greater demand for housing and this has an impact on house prices. The median house price in Mid Sussex is £370,000 (ONS, September 2018) which compares to £341,000 for the wider south-east. This figure is comparable to neighbouring Horsham but significantly higher than Crawley (£295,000), Lewes (£320,000), Wealden (£317,000) and Brighton (£347,000). House prices in Mid Sussex have increased by around 49% in the last 10 years, compared to 46% in the south-east.
- 3.19. The ratio of lower quartile house price to workplace earnings is currently 13.82 (ONS, 2017). The District Plan examination concluded that there should be an increase in housebuilding above demographic trends to increase supply with the intention to improve affordability.

Households

- 3.20. In 2001, there were 51,969 households in Mid Sussex but by 2011 the figure was 57,409 households (Census, 2011), an average annual increase of 544 households. The increasing population locally and nationally is a key factor in the growing number of households and may present challenges where infrastructure cannot be improved or additional capacity created to meet increased demand from new households.
- 3.21. The District Plan examination concluded that Mid Sussex has a housing need (Objectively Assessed Need) of 876 dwellings per annum. There is also a significant unmet need from neighbouring authorities, particularly Crawley who are within the same Housing Market Area. The District Plan therefore includes a housing requirement of 876dpa until 2023/24, and an increase to 1,090 until 2030/31 to account for this. This averages at 964dpa over the full plan period. The implications for population growth and demography for Mid Sussex is assessed under ‘Human Population’ above.
- 3.22. The average number of new houses built within Mid Sussex from 2008-2018 was 607.

2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
480	353	179	522	749	536	630	868	912	843

Table 4 - Previous Housing Completions (net)

Housing Stock

- 3.23. The housing stock in Mid Sussex is predominantly larger detached and semi-detached properties, and this type of housing accounts for 60% of the housing stock in the three towns. The majority (74%) of the housing stock in the District is in private sector ownership. This compares to the regional average of 68% and the county average of 63%. The high percentage of private sector ownership means that there are low levels of social housing (12%) and private renting (13%). Second homes account for just over 0.4% of the total housing stock (Census 2011).

Affordable Housing

- 3.24. Between April 2008 and April 2018 there have been 1,431 new affordable homes built across the District at an average of 143 affordable homes per annum with a low of 85 (2010/11) and a high of 221 (2014/15).

2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
158	157	85	202	108	122	221	113	168	97

Table 5 - Previous Affordable Housing Completions (gross)

Health

- 3.25. Overall, the health of residents in Mid Sussex is generally good; in 2011 85% reported their health as ‘Good’ or ‘Very Good’. This compares to 81% of people in the South East. 14.2% of people in Mid Sussex had a limiting long-term illness. This is lower than the West Sussex figure of 17%, the South East figure of 15.7% and the England figure of 17.6%, which also indicates a relatively good standard of health in Mid Sussex (Census, 2011).
- 3.26. The primary and community health estate is in good overall condition however there are localised capacity problems at some clinics. West Sussex Primary Care Trust indicated through the District’s Infrastructure Development Plan that primary care provision in the form of community health services will need to be improved in all the major settlements in the District.
- 3.27. In terms of access to Health facilities, 82.2% of households are within a 15 minute walk (approximately 1.2km) from a GP Surgery, Health Centre or Hospital. This figure is largely swayed by the proportion of households close to facilities within the three towns, and there are large rural areas of the District that are not within a reasonable walking distance from health facilities.

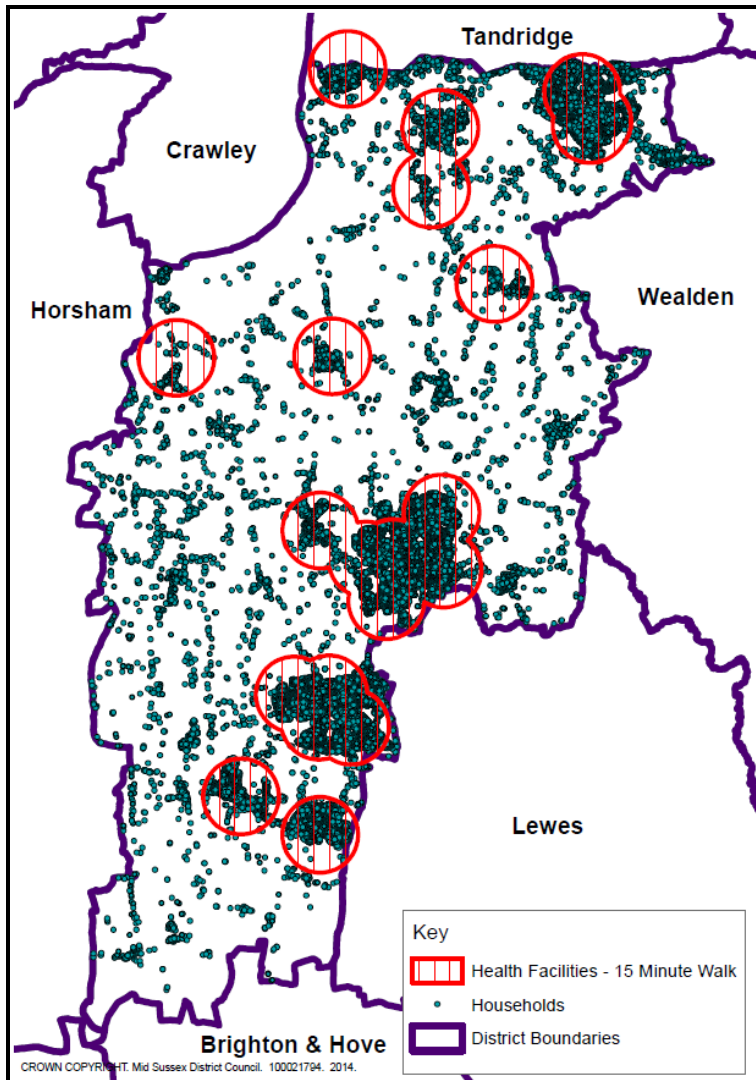


Figure 5 - Access to Health Facilities

Education

- 3.28. In Mid Sussex, there are 42 primary schools and 7 secondary schools serving the District. West Sussex County Council has consulted on primary school expansion proposals to cater for existing and forecast future demand, and has indicated that large-scale strategic

development will require new and additional educational facilities while other development may require improved facilities. The District Council will continue to engage with the County Council through the Site Allocations DPD process to ensure there is sufficient school capacity to align with development proposals.

- 3.29. In 2011, 14.8% of the District's population had no qualifications, which is less than the average for the South East (19.1%) and for Great Britain (22.5%). More people in Mid Sussex were educated to NVQ Level 4 and above (33.6%) than the average for the South East (29.9%) and Great Britain (27.4%) (ONS, 2010 and 2011).
- 3.30. In terms of primary school provision, the County Council Pupil Forecasting work (Planning School Places, 2019) deems an area full when it is operating over 95% capacity. Schools in the Burgess Hill planning area are currently at 90% capacity, East Grinstead planning area (including Ashurst Wood, Copthorne, Crawley Down, Turners Hill and West Hoathly) at 93% capacity, and Haywards Heath planning area (including Balcombe, Bolney, Cuckfield, Lindfield, Twineham, Warninglid) at 93% capacity. The Hassocks planning area, which includes Albourne, is the only planning area deemed full – at 97% capacity. New Primary Schools are identified as part of the Northern Arc development at Burgess Hill and Clayton Mills (Hassocks) strategic site; these will increase capacity in these areas.
- 3.31. In terms of secondary school provision, all areas are assessed as having capacity and are not deemed full (Burgess Hill – 83%, East Grinstead – 89%, Hassocks – 92%, Haywards Heath – 83%).
- 3.32. In terms of access to education, 89.8% of households within Mid Sussex are within a 15 minute walk (approximately 1.2km) from a primary school, and 64.9% of households are within 20 minute walk from a secondary school. This figure is largely swayed by the proportion of households close to schools within the three towns, and there are large rural areas of the District that are not within a reasonable walking distance from educational facilities.

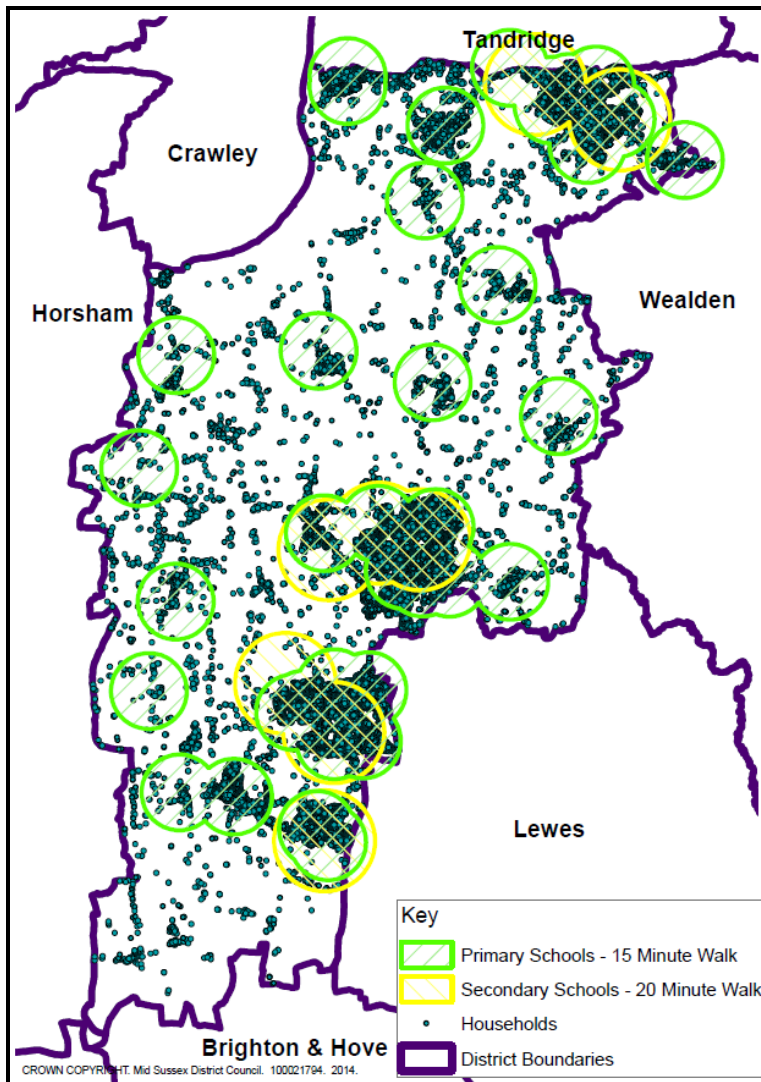


Figure 6 - Access to Education Facilities

Crime

3.33. Mid Sussex is generally a safe place to live with low levels of crime with only 36.98 crimes per 1000 residents in 2012/13 (Sussex Police).

3.34. Sussex Police have Crime Prevention Design Advisors who champion a scheme called ‘Secured by Design’ and provide advice on crime prevention. The ‘Secured by Design’ scheme combines ‘designing out crime’ with enhanced security to reduce crime and create safe and sustainable communities. The aim of ‘designing out crime’ is to reduce the vulnerability of people, property and businesses to crime as well as reducing the fear of crime. This is through designing the built environment so that opportunities for crime are removed. This includes addressing access and movement, surveillance, defensible space, and lighting.

Leisure and Recreation

3.35. A refresh (2010) of the ‘Assessment of Open Space, Sport and Recreation’ audit found that there have been improvements in the deficiencies of outdoor provision both in terms of quality and quantity, particularly in artificial pitches, play and skate park areas (note: a further refresh of this study is planned). There are still, however, deficiencies in most areas and new residential development is likely to increase demand and further burden current provision. Facilities maintained by Mid Sussex District Council include:

- 3 leisure centres
- 9 parks
- 3 bowling greens

- 4 skate parks
- 23 senior and 15 junior football sites
- 10 tennis court sites
- Over 200 equipped playgrounds
- 2 allotment sites

3.36. There is a wide range of sport and recreation facilities across the District including health and fitness clubs, sports halls, swimming pools, golf courses, synthetic turf pitches, grass pitches and bowls facilities. There are leisure centres in Burgess Hill, East Grinstead, Hassocks and Haywards Heath offering a range of sporting activities.

3.37. The District Plan, alongside other relevant plans, seeks to ensure that there are sufficient indoor and outdoor leisure activities and premises to cater for both residents and visitor requirements in the future. The Sport England Active People survey demonstrates that Mid Sussex has a comparatively high level of club membership and sports participation. It is likely that demand for leisure facilities will increase in the future so it is important that this demand is met.

Roads and Transport

3.38. Mid Sussex District Council has commissioned a refreshed Mid Sussex Transport Model (updating the version used during the District Plan examination). This will assess the transport implications of the Site Allocations DPD. Baseline reporting and site selection implications will be reported in the baseline section of the Sustainability Appraisal and will also directly impact the assessment of sites against the sustainability framework.

3.39. Car ownership in the District is high with 86.4% of households having one or more cars or vans, compared to 74.2% nationally. 44.2% of all households have two or more cars compared to 32.1% nationally which raises the risk of traffic congestion issues (Census 2011). A number of interventions such as improved signalling, junction improvements and priority bus corridors may be necessary to support proposed growth.

3.40. Air quality is an issue, particularly as habitats within the Ashdown Forest Special Area of Conservation are sensitive to atmospheric pollution, especially from road traffic emission. Additional sources of pollution should be avoided or mitigated to prevent additional adverse effects on ecological integrity.

3.41. There are six mainline railway stations in Mid Sussex, five of which are on the main Brighton to London line: Hassocks, Burgess Hill, Wivelsfield, Haywards Heath and Balcombe. East Grinstead railway station is on the East Grinstead to London line. The Bluebell Railway, a privately-owned heritage railway now provides services south from East Grinstead and has long-term plans to reinstate the disused branch line westwards from Horsted Keynes (via Ardingly) to a terminus at Haywards Heath.

3.42. In terms of access to train stations, 42.1% of the District's households are within a 15 minute walking time (approximately 1.2km) from a train station.

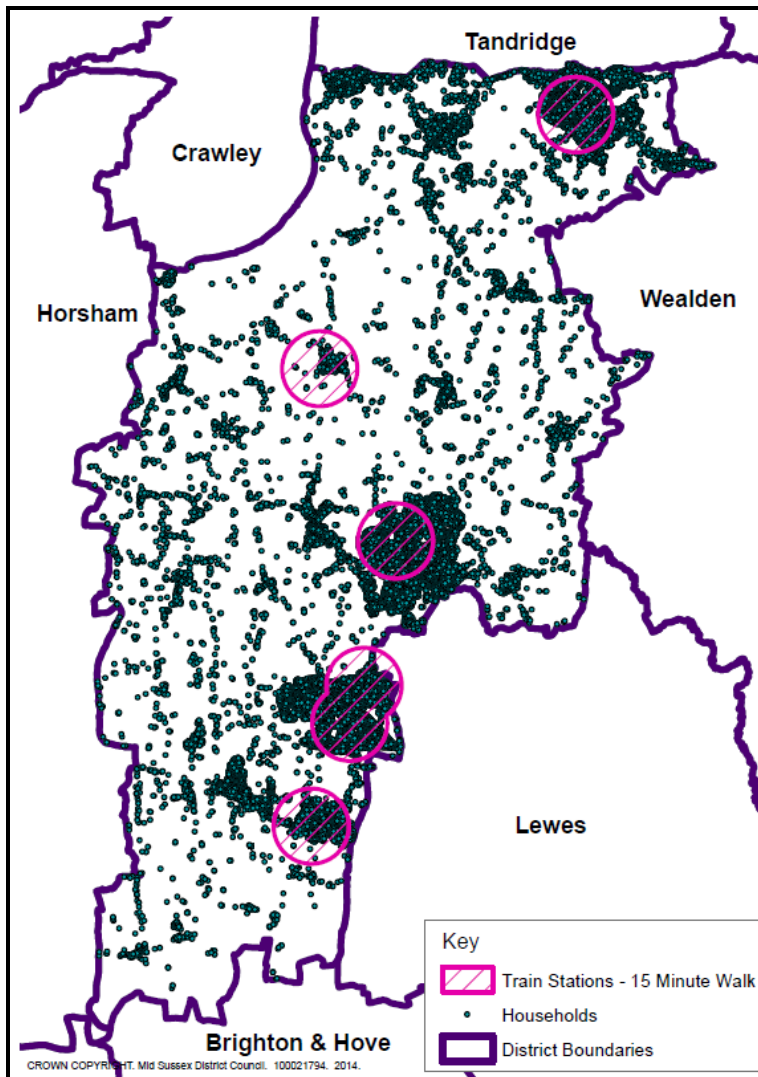


Figure 7 - Access to Train Stations

- 3.43. Private bus operators run services connecting the three towns with many of the District's villages and larger regional centres such as Horsham, Crawley and Brighton, although some services are infrequent and many do not operate in the evening or at weekends. Low passenger numbers have meant several bus services have been lost in recent years due to not being economically viable. Several community transport services also run in the District. In 2011, nearly 65% of journeys to work were by private motor vehicle, around 15% are by public transport and just over 12% are by bicycle or on foot (Census, 2011).
- 3.44. In terms of access to bus stops, 91% of the District's households are within a 5 minute walk (approximately 400m) from a bus stop. Whilst this is an encouraging figure, this does not account for the frequency of bus service as many of the rural bus stops have an infrequent service (less than 3 an hour and in some cases less than 3 a day).

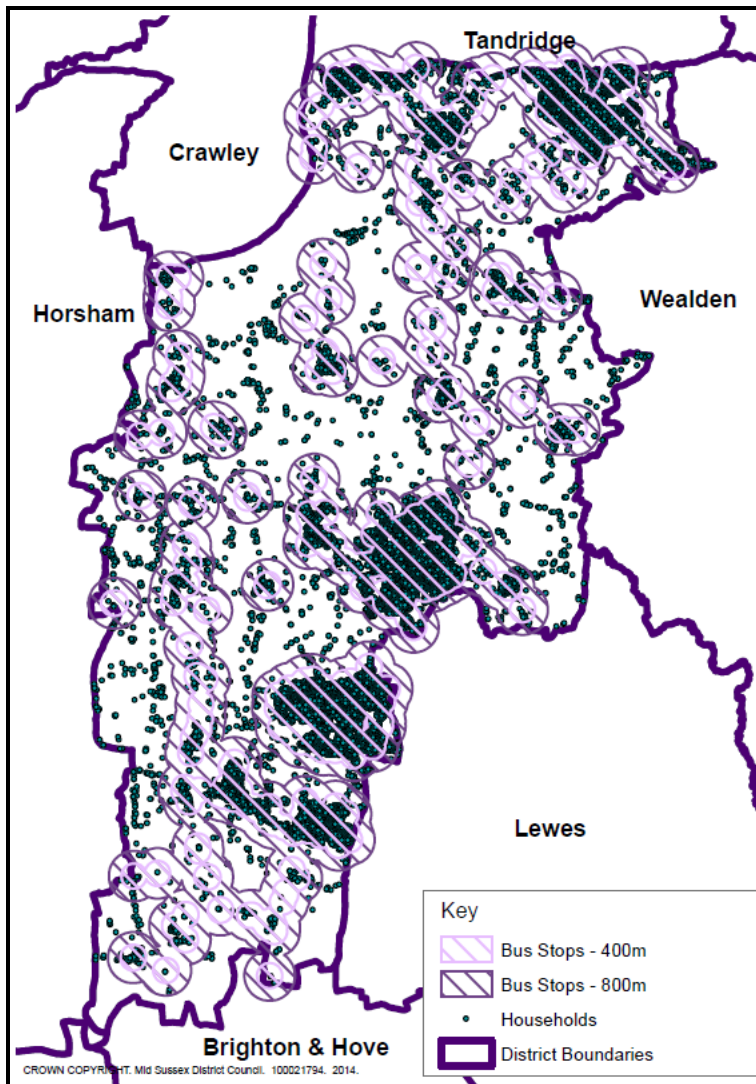


Figure 8 - Access to Bus Stops

3.45. Sustainable transport links and routes perform a key role in the District. Opportunities to enhance and upgrade existing pedestrian and cycle routes and new provision have been identified in the Council’s Infrastructure Development Plan.

3.46. High vehicle ownership and the potential for highway congestion arising from development present a significant issue. Opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged within the Site Allocations DPD.

3.47. Mid Sussex District also benefits from an extensive network of public rights of way totalling around 597.8km, including:

- Footpaths – 475.2km
- Bridleways – 117.2km
- Byways – 4.8km
- Restricted Byways – 0.6km

Environmental Baseline

3.48. Mid Sussex has a high quality natural and built environment. Around 60% of the District is covered by protected landscape designations – nearly 50% is within the High Weald Area of Outstanding Natural Beauty (AONB) and over 10% is within the South Downs National Park (Figure 9). The South Downs National Park Authority is the planning authority for the National Park, and has adopted its own Local Plan for the Park area. The area designated as the South Downs National Park is not subject to the policies within the District Plan or forthcoming Site Allocations DPD.

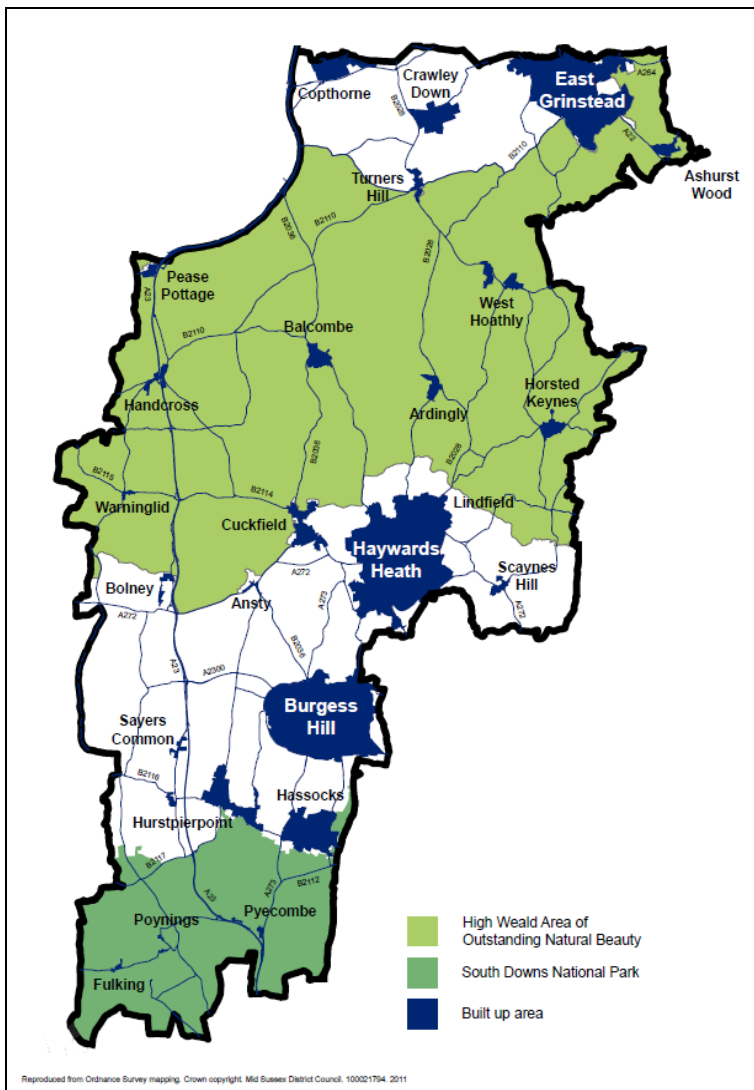


Figure 9 - The High Weald Area of Outstanding Natural Beauty and the South Downs National Park

Nature Conservation

3.49. There are a variety of nature conservation sites within the District (Table 4 and Figure 10) which are important for biodiversity. In 2017/18, 93.8% of Sites of Special Scientific Interest (SSSI) units in Mid Sussex have been found to be in ‘favourable’ or ‘unfavourable but recovering’ condition. The District is also important for species identified in the Sussex Biodiversity Action Plan (BAP), which are also subject to protection under British and European legislation. Species include the great crested newt, dormice, nesting birds, badgers and bats.

3.50. Mid Sussex is the tenth most wooded district in the South East and two-thirds of this woodland is classified as ‘ancient’, according to the Ancient Woodland Inventory for Mid Sussex (2007).

Designation	Description	Number of Sites within the District	Area of the District covered by the Designation	Percentage of the District covered by the Designation
SSSI	Site of Special Scientific Interest – a national designation for nature conservation or geological value	13	639.7 Ha	1.9%
SNCI	Site of Nature Conservation Importance – local designation for flora and fauna interest and value	50	1,094 Ha	3.3%
LNR	Local Nature Reserve – local designation for wildlife or geological importance.	6	158 Ha	0.5%
Ancient Woodland	Areas with continuous woodland cover since 1600AD.	1443	5,282 Ha	15.81%

Table 6 - Nature Conservation Sites in Mid Sussex (Source: MSDC mapping)

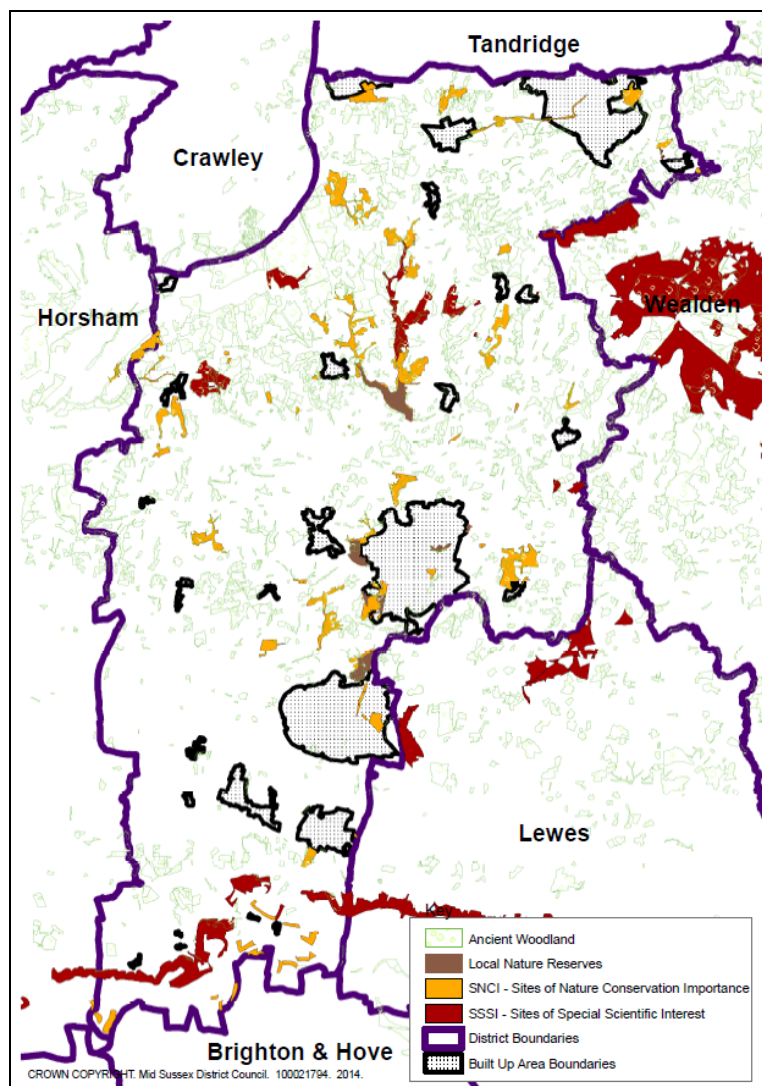


Figure 10 - Nature Conservation Sites in Mid Sussex

Ashdown Forest SPA/ SAC

- 3.51. The Natura 2000 network consists of sites across Europe designated for their nature conservation importance. It aims to be an ecologically coherent network of designated sites that protect threatened species and habitats. The Natura 2000 network is formed of Special Areas of Conservation (SAC) for species, plants and habitats (designated under the Habitats Directive) and Special Protection Areas (SPA) for bird species (classified under the Birds Directive).
- 3.52. There are no European-designated or Ramsar sites within the District, but the Ashdown Forest SPA/ SAC lies adjacent to the north-east boundary of Mid Sussex and within Wealden District (Figure 11).
- 3.53. The Ashdown Forest SPA was classified in 1996. It is a 3,200Ha site comprising predominantly of lowland heathland and woodland. The Ashdown Forest SPA is an internationally important habitat classified because of the presence of breeding populations of Dartford warbler *Sylvia undata* and European nightjar *Caprimulgus europaeus*. It is also a Site of Special Scientific Interest (SSSI).
- 3.54. The Ashdown Forest SAC was designated in 2005 and covers 2,700Ha. It has a different boundary to the SPA, but the two designations overlap. The qualifying features for the designation are the Annex I habitats: Northern Atlantic wet heaths with *Erica tetralix* and

European dry heaths, and the Annex II species: Great crested newt *Triturus cristatus*. It is also part of the SSSI.

- 3.55. Under the Conservation of Habitats and Species Regulations 2017 (as amended), any proposed plan (including the Site Allocations DPD) that may affect a European site must first undergo an assessment to look at its potential impacts. This is to determine if the plan will adversely affect the integrity of the European site(s) concerned (the Ashdown Forest SPA/ SAC).
- 3.56. The potential effects of development on Ashdown Forest were assessed during the Habitats Regulations Assessment (HRA) process for the Mid Sussex District Plan, which was adopted in March 2018. The screening exercise carried out in late 2007 and early 2008 found likely significant effects on the Ashdown Forest SPA as a result of increased recreational activity arising from new residential development and related population growth that is likely to disturb the ground-nesting birds.
- 3.57. A 2008 survey investigating visitor patterns at Ashdown Forest found that the majority (83%) of visitors originated from within a 7km distance from Ashdown Forest. A 2016 visitor survey also supports 7km as the distance that would capture the majority of frequent visitors to Ashdown Forest. Within this '7km zone of influence', measures to reduce recreational pressure would be most effective; therefore, residential development leading to a net increase in dwellings will need to contribute to an appropriate level of mitigation. This will be in the form of providing a Suitable Alternative Natural Greenspace (SANG), either on the development site itself or through a financial contribution towards a strategic SANG, and a separate financial contribution towards a Strategic Access Management and Monitoring (SAMM) Strategy. The approach to mitigation is set out in District Plan Policy DP17.
- 3.58. The District Council has a strategic SANG at East Court & Ashplats Wood in East Grinstead and a series of enhancement works will help to make the site more attractive to visitors. Work with the other affected local authorities (Wealden District Council, Lewes District Council, Tunbridge Wells Borough Council, Sevenoaks District Council and Tandridge District Council) on a Joint SAMM strategy is currently being finalised, although the District Council is currently implementing an Interim SAMM Strategy applicable to relevant planning applications.
- 3.59. The screening exercise also identified that atmospheric pollution could have an impact on the Ashdown Forest SAC. The potential air quality impacts on the Ashdown Forest SAC arise from additional nitrogen deposition resulting from increased traffic emissions as a consequence of new development. The transport modelling undertaken for the District Plan shows that the Development Case results in an overall modest reduction in traffic on the assessed routes. However, the reduction of traffic flows on the A22 and A26 is matched by an increase in traffic flows on the A275. This has been assessed further through air pollution modelling which focused on the amount of nitrogen deposition from the additional traffic-source pollution contributed by developments proposed in the District Plan, in combination with growth assumptions for surrounding local authority areas. The analysis indicates that the predicted increase in nitrogen deposition is not considered to be ecologically significant. The overall effect of the District Plan's process contribution to pollution deposition within qualifying SAC habitats can be considered neutral. The District Plan HRA report concludes that adverse effects are unlikely and no further measures are necessary.
- 3.60. Further issues to do with the Ashdown Forest SPA/ SAC will be discussed in the Habitats Regulations Assessment for the Site Allocations DPD.

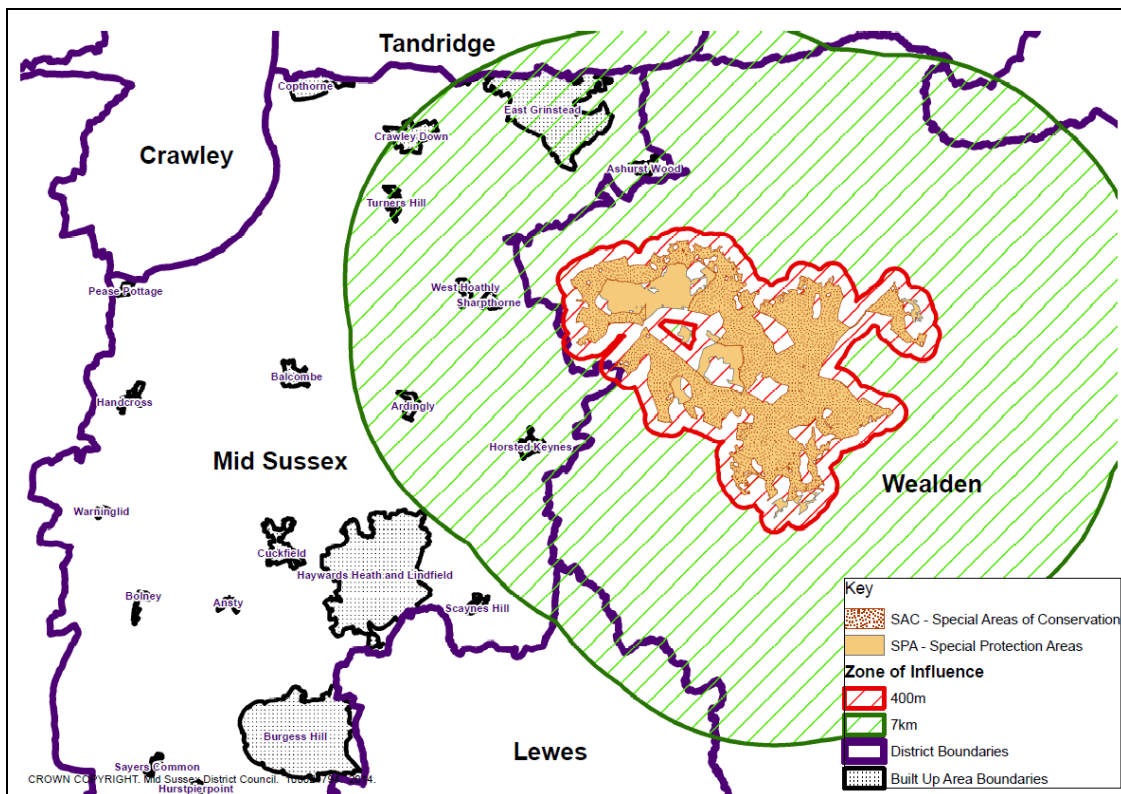


Figure 11 - Ashdown Forest Special Protection Area and Special Area of Conservation, plus zones of influence.

Landscape

3.61. There are three landscape character areas within the District: the High Weald, the Low Weald and the Sussex Downs. Mid Sussex contains areas of ancient and ghyll woodland within the stream valleys of the High Weald. There are a significant number of standing water and wetland habitats such as ponds (including historical mill sites and hammer ponds), lakes, reservoirs and water meadows. There are also many linear/ running water habitats of small streams and ditches, for example, the Upper Adur Streams, which act as a network of wildlife corridors throughout the District.

Heritage

3.62. The towns and villages of Mid Sussex are attractive and the historic environment is of a high quality. This helps to shape the areas unique character and identity. Within Mid Sussex District, there are:

- 36 Conservation Areas, designated for their special architectural or historic interest
- 1,064 Listed Buildings, of which 18 are of the highest grade (Grade I) which are considered to be of exceptional importance.
- 10 Registered Parks and Gardens
- 25 Scheduled Ancient Monuments, predominantly within the South Downs National Park
- Over 1,100 reported archaeological sites and find-spots

3.63. The District Plan ensures that the District's historic environment is offered a high level of protection so as not to put any of these important historical assets at risk, in accordance with the National Planning Policy Framework.

Air and Climate

3.64. In general, air quality in Mid Sussex is good. There is one Air Quality Management Area (AQMA) in the District in Hassocks, designated due to levels of nitrogen dioxide being above the target at Stonepound Crossroads. The main reasons for the crossroads being affected by air pollution are the volumes of road traffic and the stop/start routine of driving conditions at peak times caused by the queuing traffic at the traffic lights. The area is on the brow of a hill and is partly lined with trees. An Air Quality Action Plan was consulted upon and published in 2013 to identify actions to improve air quality. An annual progress report is published in order to monitor and report on this area.

Water

- 3.65. The Council's Strategic Flood Risk Assessment (SFRA) has identified that approximately 9km² of the District (2.7% of the total land area) is at a high risk of flooding (Figure 12). Additionally, approximately 1.6km² of the District is affected by drainage problems, groundwater flooding and overland flows. The SFRA mapping is a 'live' document which is updated with new flood events as they arise. It includes areas that have flooded historically, as well as the recently published Flood Map for Surface Water which accompanies the National Flood Risk Assessment (NaFRA).
- 3.66. Demand for water is rising and residents in Mid Sussex use approximately 181 litres of water a day. This is higher than the UK average of 154.1 litres. Most of the District is within an area identified as having a deficit in water supply and, therefore, during a dry year the demand for water will be more than the water available for use.
- 3.67. Under the Water Framework Directive, water quality targets are set in River Basin Management Plans. The majority of water bodies in the District are failing to meet the Good Status objective, and it is recognised that both ground and surface waters face threats from abstraction and pollution. Some of the existing sewerage infrastructure within the District is operating at or near capacity and unless significant investment is made to existing or through new infrastructure, water quality within the watercourses in the District may be at risk (Water Cycle Study, 2011). In particular, Goddards Green Wastewater Treatment Works (on the outskirts of Burgess Hill) has been identified as having constraints with regards to capacity and odour, which will need to be taken into account when planning for development that would drain to this particular works. Mitigation works are planned in order to provide sufficient operating capacity to accommodate the Burgess Hill Northern Arc development allocated within the District Plan.

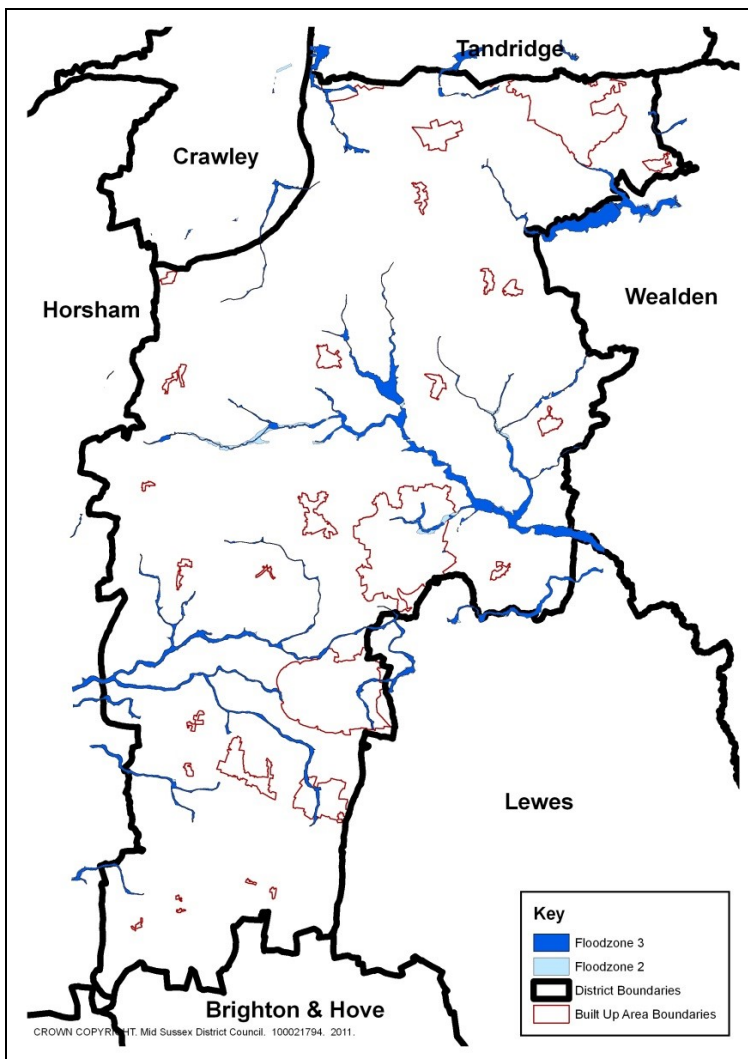


Figure 12 - Areas within an Environment Agency defined Flood Risk Zone (2 or 3)

Soils

3.68. The Agricultural Land Classification classifies land into 5 grades (Grade 1: Excellent Quality – Grade 5: Very Poor Quality) based on long-term physical limitations of land for agricultural use. Grades 1, 2 and 3a form the Best and Most Versatile Agricultural Land definition, however, the data available does not divide Grade 3 into categories 3a and 3b.

- There is no land classified as Grade 1 within the District.
- 1.4% of the District is classified as Grade 2 and the majority of this is within the South Downs National Park or the High Weald AONB.
- 63.7% of the District is classified as Grade 3, some of which is likely to fall into the Grade 3a category.
- 23.2% of the District is classified as Grade 4.

3.69. Whilst there are relatively few large-scale contaminated sites in the District, there are some small-scale contaminated sites.

Energy

3.70. The Sustainable Energy Study (2014) assessed different renewable energy sources in order to gauge the potential and possible yield. This also took into account landscape sensitivity and constraints. For instance, the potential wind resource in Mid Sussex for medium-scale turbines, when taking infrastructure, wind speeds, designations and landscape sensitivity into account, is 7.5MW (this would be greater if these issues were not taken into account).

3.71. As at the end of 2017, the following renewable energy installations were present in the District:

Type	Number	Installed Capacity (MWh)
Photovoltaics	1,958	17,832
Onshore Wind	5	47
Hydro	0	0
Anaerobic Digestion	0	0
Sewage Gas	1	3,503
Landfill Gas	0	0
Municipal Waste	0	0
Biomass	0	0
Total	1,964	21,382

Table 7 - Renewable Energy installations and capacity in Mid Sussex. (Source: Department of Energy and Climate Change, 2018)

Waste

3.72. The majority of waste produced in the District currently goes to landfill sites, but around 45% is recycled. The District Council operates a kerbside recycling scheme and there are 15 recycling 'bring sites' throughout the District (MSDC monitoring).

Economic Baseline

Economic Characteristics

3.73. Mid Sussex District is well-connected to the strategic road and rail networks between London and the south coast. Gatwick Airport is close by in the neighbouring borough of Crawley. This has meant that the local economy is influenced by these factors as well as being within commuting distance from London and the south coast. The District's location attracts businesses resulting in a healthy and vibrant economy, and as at 2018, there are around 59,000 jobs in Mid Sussex (MSDC monitoring based on Oxford Economics projections, 2018).

3.74. Just over half (54.18%) of the workforce both live and work in the District and around 45.6% of the total workforce of Mid Sussex work outside of the District. The relatively high level of out-commuting is an issue in terms of sustainability – this can lead to overcrowded trains and congestion on the road network. It also means that many of the District's highly qualified workforce are not using their skills within Mid Sussex-based businesses.

Employment Sectors

3.75. In 2011, the residents of Mid Sussex were predominantly employed in:

- Public administration (26.7%)
- Distribution, hotels and restaurants (25.9%)
- Banking, finance and insurance (24.4%)

3.76. According to the 2011 Census, 12.4% of the workforce was self-employed. The increase in broadband availability within the District is likely to have encouraged more people to have set up business from home, or work from home, since then.

Employment Rate

3.77. Mid Sussex has an employment rate of 84.7%; this is higher than the regional average of 80.8% (NOMIS, 2018). This suggests that there is a strong labour market in Mid Sussex. The unemployment rate is 2.1% in Mid Sussex, which is lower than the average figure for the

South East of 3.4%. The claimant count rate (i.e. the number of people claiming Job Seekers Allowance) is 0.9%, which is lower than the South East average of 1.7% (NOMIS, 2018).

Economic Activity Rate

3.78. The economic activity rate is the percentage of people who are in work or are seeking work. Of those aged 16-64, 85.5% are economically active, which compares to 80.8% for the South East (Annual Population Survey, 2018).

Business Activity

3.79. There were 7,980 active businesses in Mid Sussex in 2016, of which 5,960 employ 1-4 people. The number of active businesses in Mid Sussex has increased yearly since 2009; Mid Sussex has the second largest number of active businesses in West Sussex (Mid Sussex Economic Profile, 2018).

3.80. The District saw the largest increase in West Sussex of enterprise births between 2013 and 2014 at 9%. There were 905 enterprise births in 2014, the highest number in the County (Mid Sussex Economic Profile, 2018).

Earnings

3.81. In 2018, the average gross weekly pay for workers who live in the District was £645.40. This is higher than the averages for the South East (£614.50) and Great Britain (£571.10).

Retail

3.82. The Retail Study (2014) looked at retail needs in each of the three main towns.

- For convenience goods, the study concluded that there was not District-wide capacity for new retail floorspace but recommended that the Council supports improvements to existing foodstore provision and accessibility in the network of town centres.
- For comparison goods, the study recommended that it will be important to maintain, and enhance, the existing market share, providing a better choice and quality of higher order comparison retailing.

Tourism

3.83. Tourism plays an important role in Mid Sussex and 9% of jobs in the District are tourism-related. There are a variety of attractions in Mid Sussex including gardens, historic buildings, windmills, a steam railway, museums, farms and nature reserves as well as numerous local events. Between 2010 and 2012 there were 154,000 trips to Mid Sussex for tourist purposes, with a total tourist spend of £17m (Visit England – Great British Tourism Survey 2013).

Challenges Collecting the Baseline Data

3.84. There are some challenges collecting the baseline information, which mean that there are some data limitations. As noted in SA guidance, it is important to set these out.

- The most up-to-date and reliable data source has been used at all times where possible.
- One of the difficulties in collecting the data has been obtaining data at a district level. For example, some data is only available at a county or regional level.
- It is necessary for the data to be collected on an annual basis for monitoring purposes. Some data is released or collated yearly which is ideal for monitoring purposes. Other datasets are released at longer time intervals. Where data has to be collated by the District Council using its own internal systems (for example, the planning application database or mapping software (GIS)), this has to be done with limited resources in terms of time and cost. Where collecting data would be unreasonable in terms of time and cost, alternatives have been sought where

possible. It is important that the task of collecting data is not onerous, and the benefit from collecting it outweighs the time spent doing so.

- As external organisations collect some of the data, Mid Sussex District Council has little control over the spatial and temporal nature of data collected and whether this may change in the future. It is important, for monitoring purposes, that the information is from a reliable source and can be compared with similar data retrieved over time in order for reasonable comparisons/ trends to be made.
- Baseline data relates to Mid Sussex only, unless noted otherwise. It is possible that the Site Allocations DPD will have an impact outside the district. It would not be practical to collate baseline data for all neighbouring areas on the range of subjects considered within this baseline section; however the potential impact outside of Mid Sussex and 'cross-boundary effects' will be considered when appraising the strategy/sites/policy within the draft DPD.

4. Identifying Sustainability Issues and Problems

Task A3 - Identifying Sustainability Problems

4.1. The review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) and analysis of the baseline position within Mid Sussex undertaken in Section 3 help to determine the sustainability issues and challenges facing Mid Sussex district.

4.2. These issues and challenges include:

Social

- An increasing population, and the need for additional infrastructure⁵ capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- A changing and ageing population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- Need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- Primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- Existing school capacity issues will need to be addressed
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- High vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged
- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the District mostly in relation to access to local community services – this can create social exclusion.
- Low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- Demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.

⁵ Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open space.

- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments. The impact of climate change on flood risk will need to be accounted and planned for.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste. Recycling rates are increasing.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts on traffic and environmental quality. Whilst it is recognised that commuters make a significant financial contribution to the District, it is important that appropriate employment opportunities are promoted within the District to ensure people who live locally can work locally.
- The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained
- There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems.
- The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.

5. Sustainability Framework – Objectives and Indicators

Task A4 – Developing the Sustainability Appraisal / SEA Objectives

Sustainability Objectives and Indicators

- 5.1. In order to assess the contribution the draft submission (Regulation 19) Site Allocations DPD will make towards achieving sustainable development, a range of sustainability objectives have been developed. These objectives are based on the three strands of sustainability: **Social, Environmental and Economic**.
- 5.2. The Sustainability Appraisal must test the policies and potential sites within the Site Allocations DPD against the sustainability objectives. It must also test a range of reasonable alternatives for the strategy, policies and sites. By doing this, all reasonable alternatives will have been considered and their relative sustainability recorded to determine the most sustainable policies and sites for inclusion within the Site Allocations DPD. This ensures that the plan itself is the most sustainable given all reasonable alternatives.
- 5.3. The impact of each strategy/policy/site option on each of the objectives will be appraised accordingly using the ‘++’ to ‘--’ method as described in section 2 - a prediction as to whether the baseline status of each objective will improve, stay the same or get worse as a result of the policy option in question.
- 5.4. Each objective is quantified by a number of measurable indicators which can be monitored over time to ensure the policies and sites within the Site Allocations DPD are performing as predicted by the appraisal, once adopted. The sustainability objectives and associated indicators make up the ‘Sustainability Framework’.
- 5.5. The objectives chosen represent the issues and challenges facing the District throughout the plan period as identified in section 3. The indicators have been chosen to provide the best possible sources in order to quantify and measure the achievement of each objective. Appendix 2 shows the current baseline figures for as many indicators as possible, the data source from where this has been obtained, and predicted future impacts. Where it is not currently possible to obtain data for an indicator, a reason has been provided. The Council will be investigating ways to collect this data in future, and progress on this will be reported in future stages of this Sustainability Appraisal report.
- 5.6. The proposed sustainability objectives and their corresponding indicators are:

SOCIAL

1	<p>To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford</p> <ul style="list-style-type: none"> - <i>housing completions per annum (net)</i> - <i>number of affordable homes completed annually (gross)</i> - <i>financial contributions towards affordable housing provision</i> - <i>number of households accepted as full homeless</i>
2	<p>To improve the access to health, leisure and open space facilities and reduce inequalities in health.</p> <ul style="list-style-type: none"> - <i>number of applications resulting in new, extended or improved health facilities</i> - <i>number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital</i> - <i>number of households within 300m of leisure and open space facilities (as defined in the Open Space study)</i>

	<ul style="list-style-type: none"> - <i>financial contributions towards leisure facilities</i> - <i>amount of additional community facilities delivered</i>
3	<p>To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.</p> <ul style="list-style-type: none"> - <i>percentage of population of working age qualified to at least NVQ level 3 (or equivalent)</i> - <i>percentage of adults with poor literacy and numeracy skills</i> - <i>number of households within a 15 minute walk (approx. 1.2km) from a Primary School</i>
4	<p>To improve access to retail and community facilities.</p> <ul style="list-style-type: none"> - <i>number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities</i> - <i>number of households within a 15 minute walk (approx. 1.2km) from a convenience store</i> - <i>number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)</i> - <i>number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc)</i>
5	<p>To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities.</p> <ul style="list-style-type: none"> - <i>all crime – number of crimes per 1000 residents per annum</i> - <i>number of domestic burglaries per 1,000 households</i> - <i>Number of dwellings permitted more than 150m from a built-up area boundary</i>

ENVIRONMENTAL

6	<p>To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), thereby minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA)</p> <ul style="list-style-type: none"> - <i>percentage of the District that is within Flood Zone 2/Flood Zone 3</i> - <i>number of properties at risk from flooding, as defined by the Environment Agency</i> - <i>number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds</i>
7	<p>To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.</p> <ul style="list-style-type: none"> - <i>percentage of new and converted homes developed on brownfield land</i> - <i>percentage of new employment floorspace on previously developed land</i> - <i>average density of new housing developments</i> - <i>amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development</i>

8	<p>To conserve and enhance the District's biodiversity. (SEA)</p> <ul style="list-style-type: none"> - number and area of Sites of Nature Conservation Importance (SCNI) and Local; Nature Reserve (LNR) within the District area of ancient woodland within the District - condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar) - number of planning applications approved contrary to advice given by Natural England on biodiversity issues - number of dwellings permitted within the 7km Zone of Influence (SPA) - Capacity of Suitable Alternative Natural Greenspace (SANG) - net gain in biodiversity
9	<p>To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)</p> <ul style="list-style-type: none"> - open spaces managed to green flag standard - number of applications approved contrary to advice from the High Weald AONB unit - amount of new development (units) within the High Weald AONB - number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space) - hectares of accessible open space per 1000 population.
10	<p>To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)</p> <ul style="list-style-type: none"> - number of Listed Buildings in the District - buildings of Grade I and II* and scheduled monuments at risk - number of Conservation Areas in the District - number of Conservation Areas with appraisals and management proposals
11	<p>To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)</p> <ul style="list-style-type: none"> - number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour) - number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour) - number of households within a 15 minute walk (approx. 1.2km) of a train station - proportion of journeys to work by public transport - percentage of residents living and working within Mid Sussex - monetary investment in sustainable transport schemes (value of s.106 agreements) - number of Air Quality Management Areas (AQMA) within the District
12	<p>To increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal</p> <ul style="list-style-type: none"> - domestic energy consumption per household - number of renewable energy installations within Mid Sussex - installed capacity of renewable energy installations within Mid Sussex - percentage of domestic waste that has been recycled

13	To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)
	<ul style="list-style-type: none"> - <i>Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"</i> - <i>Stretches of watercourse with no deterioration in Water Framework Directive status</i> - <i>incidents of major and significant water pollution within the District</i> - <i>number of planning applications approved contrary to advice given by the EA on water quality issues</i>

ECONOMIC

14	To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.
	<ul style="list-style-type: none"> - <i>Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)</i> - <i>number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)</i>

15	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.
	<ul style="list-style-type: none"> - <i>percentage of Mid Sussex residents who are employed</i> - <i>percentage of Mid Sussex residents who are economically active</i> - <i>average weekly income (gross) for those who are employed in the District</i> - <i>percentage of residents living and working within Mid Sussex</i> - <i>job density (ratio of jobs to working age population)</i>

16	To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.
	<ul style="list-style-type: none"> - <i>net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace</i> - <i>number of businesses within the District</i> - <i>number of new businesses setting up in the District</i>

Sustainability Appraisal report focuses on the strategy options and site options for allocation. There are also a number of other policies, which have been identified as needed to support the allocation of sites. Reasonable alternatives for these have also been tested through the appraisal process.

- 5.11. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified. Reasonable Alternative site options that were derived from the Regulation 18 consultation have been appraised.
- 5.12. All policy areas/site options and the various alternative options developed for each policy have been appraised in order to assess their impact on the 16 sustainability objectives. Where it was considered that there was only one realistic option for a policy area, this has been appraised against a ‘Do Nothing’ scenario – in other words “To not have a policy”.
- 5.13. The term “To not have a policy” refers to the fact there will not be a policy on the subject within the Site Allocations DPD. It does not ignore the fact that some policy topics are still covered by legislation, national planning policy, the District Plan, or other material guidance. These, however, may be less locally specific, less stringent, or more generic in their requirements. In some cases, not having a policy would mean there being no policy cover on that particular topic at any level. The difference between these two is noted where appropriate.

Task B1 – Testing the plan or programme against the SA / SEA Objectives

Task B3 – Predicting the effects of the plan or programme, including alternatives

Task B4 – Evaluating the effects of the plan or programme, including alternatives

- 5.14. The appraisals are tabulated in the following sections 6 to 8, and Appendix 4. This exercise ensures that the policies within the District Plan are the most sustainable, given all reasonable alternatives. In some cases, a number of alternative policy options have been developed but not appraised – the reasons for not appraising these has been given. In most cases this is because the option is either not realistic (in that it is undeliverable or unlikely to be implemented) or is not significantly different to option(s) already appraised – i.e. it is not felt to be a reasonable alternative option.
- 5.15. The appraisal process has been undertaken using the methodology outlined in section 2. The appraisal focuses on the significant effects on the objectives, and the likely direction of change based on a prediction of how the policy would impact on the various indicators for each objective. A summary of the appraisal is given, giving reasoned justification for how the options were appraised and explaining the significant differences between the impacts.
- 5.16. Determining the preferred policy option has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the ‘preferred option’. Where it is unclear which option performs best, the predicted impact on the sustainability objective(s) most closely related to the policy topic have been given more importance. For example, the option with the most positive score on the flooding objective would be seen as preferable for a policy on flood risk, if all other objectives score similarly overall. There may be reasons why the most sustainable option, when appraised against the objectives, is not suitable for taking forward in the Site Allocations DPD. Where there are reasons outside of the scope of the SA, these are noted.

Task B5 – Considering ways of mitigating adverse effects

- 5.17. Whilst it is predicted that many of the preferred options will have an overall positive or neutral/unknown impact, it is inevitable that some will present negative sustainability impacts. This is predominantly in cases where the sustainability objectives are not compatible with one another (for example, objectives on development of housing/employment/community

facilities will not always be compatible with objectives on protection of the countryside or biodiversity) as shown above. The exercise outlining the compatibility of objectives, and where these conflicts may lie should be considered when drawing conclusions. Where negative impacts are predicted to arise, mitigation has been suggested.

6. Housing – Requirement, Site Selection, Preferred Options

District Plan – Housing Requirement

- 6.1. The Mid Sussex District Plan was adopted in March 2018. One of the key elements of the District Plan was to set the district housing requirement, and a strategy for delivering this. The District Plan establishes a housing need of 876 dwellings per annum (dpa), a total requirement of 14,892 across the plan period 2014-2031. This reflects a baseline household projection with an uplift to account for vacancies and to improve affordability.
- 6.2. The District Plan sets a housing requirement of 16,390 - approximately 1,500 above the housing need. This represents a contribution towards housing need that cannot be met within the Northern West Sussex Housing Market Area, predominantly within Crawley Borough.
- 6.3. The District Plan sets this out in a stepped trajectory. This was necessary in order to ensure that the implications of housing growth on the nearby Ashdown Forest SAC could be fully understood before proceeding to allocate/permit additional sites. The plan requirement is therefore:
- 876dpa for the period until 2023/24
 - 1,090dpa for the period 2024/25 – 2030/31.
- 6.4. The District Plan sets out the strategy for delivering the housing requirement in policy **DP4: Housing**. At the time of publication, the position (as at 1st April 2017) was:

District Plan Minimum Requirement	16,390
Completions (2014/15 - 2016/17)	2,410
Total Housing Commitments (inc. strategic developments already with permission)	7,091
Strategic Development – Northern Arc, Burgess Hill	3,500
Strategic Development – Land north of Clayton Mills, Hassocks	500
Windfall Allowance	450
Elsewhere in the district, as allocated through future Neighbourhood Plans and the Site Allocations DPD	2,439

Table 9 - District Plan Housing Requirement

- 6.5. The residual housing need to be identified through Neighbourhood Plans or the Site Allocations DPD was therefore 2,439 at the time the District Plan was adopted.
- 6.6. Since publication of the District Plan there have been two completed monitoring years (2017/18 and 2018/19) and therefore two years' worth of housing completions. Similarly, the number of commitments (i.e. sites with planning permission or allocated for housing) will have changed as further permissions have been granted and Neighbourhood Plans 'made'.
- 6.7. Officers have also undertaken on-going due diligence work regarding housing supply – in particular the delivery rates on the Northern Arc, Burgess Hill. This work has identified that approximately 713 of the 3,500 units will now deliver beyond the plan period (i.e. after 2031). In order to address this, and ensure that the housing need identified in DP4 is met in full (as a minimum), it is intended to allocate additional sites within the Site Allocations DPD. Any delivery at the Northern Arc beyond 2031 will contribute towards the housing supply in future plan periods – in particular the plan period covered by the District Plan review.
- 6.8. The District Plan windfall allowance was based on the Windfall Study 2015. This identified future projected windfall based on sites sized 1-5 units, and concluded that a windfall allowance of 45 dwellings per annum was appropriate from year 6 onwards (i.e. 10 remaining plan years – 450 dwellings). Since adoption of the District Plan, the windfall allowance has been revised to include sites sized 1-9 units, as policy DP6 supports sites "fewer than 10

units” where the site is contiguous with the built-up area boundary. On this basis, the windfall allowance has been increased to 84 dwellings per annum from year 6 onwards (i.e. 7 remaining plan years – 588 dwellings). Reasonable Alternative options for significantly lower/high windfall figures have been rejected, as they are not supported by robust evidence.

6.9. The revised housing supply position as at April 2020 is therefore:

District Plan Minimum Requirement	16,390
Completions (2014/15 - 2019/20)	4,917
Total Housing Commitments (inc. strategic developments already with permission)	9,689
Windfall Allowance	504
Elsewhere in the district, as allocated through future Neighbourhood Plans and the Site Allocations DPD	1,280

Table 10 - Revised Housing Residual Figure

6.10. In order to meet the District Plan requirement in full within the plan period 2014-2031, it is intended that the Site Allocations DPD should at least plan for the ‘residual requirement’, a minimum of **1,280** dwellings. In accordance with policy **DP4: Housing**, the residual requirement should be spatially distributed in general accordance with the established settlement hierarchy.

Settlement Category	Settlements	Minimum Residual
1 – Town	Burgess Hill, East Grinstead, Haywards Heath	706
2 – Larger Village	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint, Lindfield	198
3 – Medium Sized Village	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly	371
4 – Smaller Village	Ansty, Staplefield, Slaugham, Twineham, Warninglid	5
5 – Small Settlement	Birch Grove, Brook Street, Hickstead, Highbrook, Walstead	N/A
Total		1,280

Table 11 - Residual Figure by Settlement Category

Housing - Strategy

6.11. The updated residual housing requirement to be identified within the Site Allocations DPD is 1,280 dwellings. The spatial distribution of housing was also established in the District Plan – in broad category terms in **DP4: Housing** (table 11 above), and an indication of the level of development for each settlement in **DP6: Settlement Hierarchy**. The methodology for attributing the residual housing requirement to category/settlements was found sound through the District Plan process and it is not intended to revise it at this stage.

6.12. District Plan policy **DP6: Settlement Hierarchy** breaks down the Settlement Category residual figures as follows:

Category	Settlement	Residual Requirement (DP6)
1	Burgess Hill	0
	East Grinstead	706
	Haywards Heath	0
2	Cuckfield	198
	Hassocks	0
	Hurstpierpoint	0
	Lindfield	0
	Copthorne	0
	Crawley Down	0
3	Albourne	36
	Ardingly	16
	Ashurst Wood	0
	Balcombe	18
	Bolney	30
	Handcross	0
	Horsted Keynes	70
	Pease Pottage	0
	Sayers Common	15
	Scaynes Hill	119
	Turners Hill	60
	Sharpthorne	4
	West Hoathly	4
4	Ansty	0
	Staplefield	0
	Slaugham	0
	Twineham	5
	Warninglid	0
	TOTAL	1,280

Table 12 - Residual Figure by Settlement

- 6.13. The spatial distribution set out in the District Plan was subject to Sustainability Appraisal at the time. This showed that the District Plan spatial strategy was appropriate and the most sustainable given reasonable alternatives. The District Plan policies provide the basis for allocations in the Site Allocations DPD, this was always intended to be the case (as the DPD is a ‘daughter’ document of the District Plan and it is referred to in DP4). It is therefore not necessary to identify reasonable alternatives to the overall strategy.
- 6.14. It is recognised, however, that the District Plan spatial strategy was appraised and adopted before detail on individual sites was known. In other words, whilst it was accepted that the strategy was deliverable at a high-level and the District Plan Sustainability Appraisal reported that this was the case, this could not be confirmed until the Council had completed analysis of any sites submitted (through the SHELAA process) on a site-by-site basis and in-combination with each other. Therefore, whilst it is fully intended to allocate sufficient sites in order to meet the category/settlement residual requirements set out in DP4/DP6 as far as possible; there may be reasons why this cannot be achieved. This may be because:
- There were no sites submitted, or no suitable sites within a particular settlement or settlements;
 - The total yield from all sites submitted to the Council would not achieve the residual figures identified for the settlement or settlements

- The in-combination negative impacts from allocating sufficient sites to meet the residual category/settlement need may, on balance, not outweigh any positive impacts anticipated.

- 6.15. Site Selection Paper 2 (published December 2018, revised February 2020) explains that the starting point is to allocate sufficient sites to achieve the established District Plan distribution, however following assessment in both the Site Selection process and Sustainability Appraisal there may be a need to revisit DP4: Housing and DP6: Settlement Hierarchy to ensure the sites selected meet with the District Plan Strategy as closely as possible (Site Selection Paper 2, para 2.9). It also describes the role of the settlement hierarchy – if housing need cannot be met within one settlement category, it should be met (in the first instance, and were possible) at a settlement in a higher-level category as these were deemed as being more sustainable.
- 6.16. Site Selection Paper 2 (paras 6.2 - 6.3) also recognises that, in order to meet the District Plan strategy, conclusions will be compared on a settlement-by-settlement basis with the most suitable sites at each settlement chosen in order to meet the residual needs of that settlement. This may result in some sites being chosen for allocation which have higher negative impact across all the objectives because this will be on the basis that the aim is to distribute allocations according to the District Plan strategy in the first instance; as opposed to simply selecting only the most sustainable sites in the district (as this may not accord with the spatial strategy and would lead to an unequal distribution of sites across settlements).

Site Selection Process – Establishing Reasonable Alternatives for Appraisal

- 6.17. The objective of the Site Allocations DPD is to allocate sufficient sites to meet the residual housing need identified in the District Plan (updated to reflect recent commitments and completions), and to allocate sites in locations that are compliant with the District Plan strategy set out in policies DP4/DP6. The Council has followed a logical, step-by-step process in order to arrive at a selection of sites to be appraised within this Sustainability Appraisal.

Pool of Sites

- 6.18. The Council's SHELAA acts as the 'pool' of potential sites from which candidate sites for the Site Allocations DPD can be assessed and put forward for allocation if suitable. Sites that are not taken forward during the Site Allocations DPD process remain in the SHELAA and will form the 'pool' of sites for the District Plan review or any other future allocations DPD.
- 6.19. The Council first published a Strategic Housing Land Availability Assessment (SHLAA) in 2009. This included housing sites (over 5 units) that had either been identified by the Council or submitted to the Council, such as through various 'call for sites' exercises. Following adoption of the District Plan, the SHLAA was broadened to include employment sites and was republished in April 2018 as the SHELAA. This involved a further 'call for sites' period and liaison with developers, landowners and agents. The SHELAA was published to include 233 sites, 20 additional sites were submitted during the Regulation 18 consultation. In total, the SHELAA includes 253 housing sites that have been assessed in accordance with the published SHELAA methodology, totalling around 30,000 units.
- 6.20. The purpose of the SHELAA is to identify a future supply of land which is suitable, available and achievable for housing uses over the plan period. This includes sites that may be required in the future in the context of a District Plan review or any future allocations document. At present, however, the Site Allocations DPD is only concerned with meeting the residual housing requirement, and doing so in accordance with the current strategy as set out in the adopted District Plan.

- 6.21. Due to the large number of sites within the SHELAA, and the fact that the majority of these would not be suitable/achievable in the context of the timescale and housing requirement for the Site Allocations DPD to deliver, the sites within the SHELAA itself do not represent reasonable alternatives.
- 6.22. The Council has established a methodology in order to ‘filter’ the SHELAA to only those sites that should be considered for allocation in the Site Allocations DPD. These are in general accordance with the District Plan strategy (see Site Selection Paper 1) and have been assessed against a wide range of criteria to ensure that only the most suitable and achievable sites are considered (i.e. those with clear constraints have been ruled out at this stage – see Site Selection Paper 2). This has established a collection of sites that can be classified as Reasonable Alternatives in Sustainability Appraisal terms.

Site Selection Process

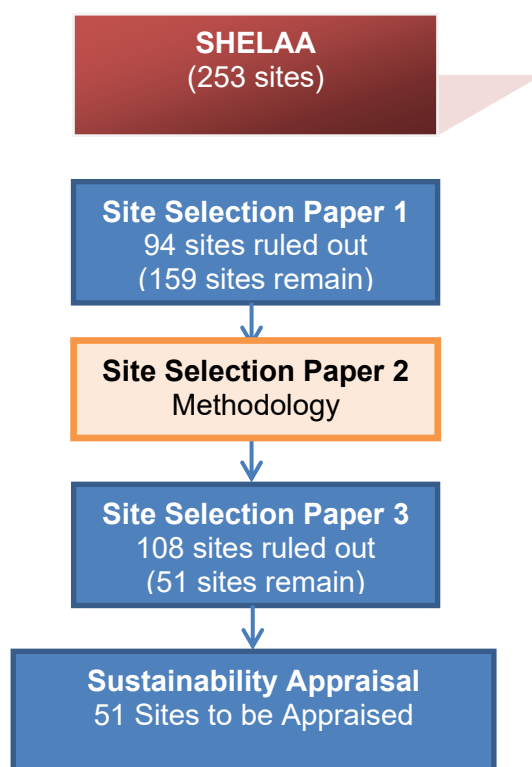


Figure 13 - Site Selection Process

- 6.23. For the purposes of the Site Allocations DPD, the Council established a methodology to refine the sites in the SHELAA, leaving a set of shortlisted sites for detailed assessment and consequently potential allocation.
- 6.24. **Site Selection Paper 1:** This paper lists the sites that do not conform with the District Plan strategy and removes them from further consideration in the Site Allocations DPD process. These sites are either remote from existing settlements (therefore not in accordance with the District Plan strategy to promote growth at existing settlements) and/or the yield of the site is too large by comparison to the category/settlement residual requirements set out in DP4/DP6.
- 6.25. In total, Site Selection Paper 1 (February 2020) established that 94 sites did not conform with the District Plan strategy and were therefore not to be considered further in the Site Allocations DPD process. It is important to emphasise that these sites have only been ruled out from the Site Allocations DPD process, and therefore remain in the SHELAA and for consideration at a later date (for instance, through the District Plan Review process or forthcoming allocations documents).

- 6.26. For the purposes of the Sustainability Appraisal, the 94 sites that were deemed not in conformity with the District Plan strategy have been rejected at this stage, and are therefore not reasonable alternative options for allocation.
- 6.27. **Site Selection Paper 2:** This paper sets out a methodology for assessing the remaining sites. This paper set out 17 criteria by which to assess sites against. The methodology was consulted upon and published in December 2018.
- 6.28. **Site Selection Paper 3:** This paper presents the assessment of the remaining sites against the criteria set out in Site Selection Paper 2. This includes the publication of a proforma for each site with the scoring against the criteria and reasoned justification for the score. The site proformas were consulted upon with developers/landowners/agents during a ‘fact check’ process to ensure the assessments were accurate. The finalised site proformas are published within Site Selection Paper 3 (February 2020), alongside the conclusions reached with regards to their suitability for allocation.
- 6.29. Site Selection Paper 3 explains that, following assessment against the criteria, a total of 51 sites remain as having potential for allocation and should be subject to further evidence base testing and assessment.
- 6.30. As these sites are concluded as still having potential (subject to further testing), they have been considered as reasonable alternative sites for assessment through the Sustainability Appraisal process. This means that a total of 108 sites were rejected as reasonable alternatives as part of the analysis within Site Selection Paper 3: Housing.

Housing Supply Potential from 51 Remaining Sites

- 6.31. In total, the remaining 51 shortlisted sites would yield 3,930 dwellings. This is more than double the residual housing requirement of 1,280 and therefore implies there are still choices to be made regarding the final selection of sites for allocation.

Category	Settlement	Supply from 51 Shortlisted Sites	Residual Requirement (DP6)	Difference
1	Burgess Hill	634	0	634
	East Grinstead	830	706	124
	Haywards Heath	723	0	723
2	Cuckfield	259	198	61
	Hassocks	175	0	175
	Hurstpierpoint	297	0	297
	Lindfield	270	0	270
	Copthorne	0	0	0
	Crawley Down	50	0	50
3	Albourne	0	36	-36
	Ardingly	70	16	54
	Ashurst Wood	12	0	12
	Balcombe	0	18	-18
	Bolney	140	30	110
	Handcross	65	0	65
	Horsted Keynes	65	70	-5
	Pease Pottage	0	0	0
	Sayers Common	156	15	141
	Scaynes Hill	20	119	-99
	Turners Hill	22	60	-38
	Sharpthorne	0	4	-4

	West Hoathly	0	4	-4
4	Ansty	142	0	142
	Staplefield	0	0	0
	Slaugham	0	0	0
	Twineham	0	5	-5
	Warninglid	0	0	0
	TOTAL	3,930	1,280	2,650

Table 13 - Housing Supply from 51 Shortlisted Sites

- 6.32. In examining the location of the 51 shortlisted sites, it is clear that some settlements will not be able to meet their guideline (DP6) residual housing requirement. This is to be expected, as the housing requirements were established ‘policy off’ (as per national guidance on assessing objectively assessed need), i.e. before an assessment of potential sites was undertaken.
- 6.33. For Albourne, Balcombe, Sharpthorne, West Hoathly and Twineham, there are no suitable sites – as described in Site Selection Paper 2, the requirement from these settlements will be distributed firstly amongst other settlements within the same Settlement Category. For Horsted Keynes, Scaynes Hill and Turners Hill, there are some suitable sites that contribute towards the housing requirement; however there is still a shortfall. Again, this will be distributed firstly amongst other settlements within the same Settlement Category.
- 6.34. In total, the 51 shortlisted sites yield 3,930 units. This is 2,650 units more than the residual amount of 1,280. The distribution is unbalanced at settlement category and settlement level – clearly there is a significant over-supply at some individual settlements. This implies there is still some refining to do in order to arrive at a collection of sites that best meets the spatial strategy in the most suitable and sustainable way.

Site Selection

- 6.35. The remaining 51 sites are judged to be reasonable alternative options for the purposes of the Sustainability Appraisal and have therefore been appraised against the Sustainability Framework.
- 6.36. In order to assess the performance of the remaining 51 sites, they have been subject to individual site appraisals against the Sustainability Framework (Section 5). These have been presented collectively on a settlement basis. This means that:
- The performance of individual sites can be assessed
 - The performance of sites relative to other sites within the same settlement can be assessed
- 6.37. Conclusions can therefore be reached as to the merits of each site individually, but also the extent that the residual housing requirement in each settlement can be met before any negative impacts are not outweighed by any positive impacts expected. This is important, as the sites chosen for allocation should be in general accordance with the spatial strategy set out in District Plan policies **DP4: Housing** and **DP6: Settlement Hierarchy**. This approach was described in Site Selection Paper 2 and presented in Site Selection Paper 3.
- 6.38. One possible approach would be to allocate the all remaining 51 sites. There are a number of valid reasons why this has been considered, but rejected as a reasonable alternative approach:
- The District Plan evidence supports a total delivery of 16,390 throughout the plan period. Although this is expressed as a minimum requirement, an allocation significantly beyond this may not be supported by the existing evidence base (in particular where infrastructure capacity or environmental constraints are concerned).

- Allocating significantly in excess of the figures in DP4/DP6 is not in accordance with the District Plan strategy. Significantly higher figures would be better delivered following sufficient testing during the District Plan review process.
- Although the sites have been shortlisted, this conclusion is based on individual site assessments rather than assessing them in-combination or on a settlement basis. There may be negative in-combination effects. For example, two adjacent/vicinity sites of 50 units may be acceptable individually but allocating both (totalling 100 units) may lead to negative effects.
- The District Plan sets out the indicative residual requirement for each settlement in policy DP6. Future planning (e.g. infrastructure, baseline transport modelling, etc) will have been broadly based on this distribution.
- There may be an excess of sites in locations that have already met their residual housing need; significantly increased supply in these locations would lead to an unbalanced spatial distribution.

Housing Sites – Site Appraisal Conclusions

6.39. The individual and settlement appraisals are presented in Appendix 4. Following their assessment, it is clear that the sites fall into three categories as indicated on the appraisals tables themselves:

Sites That Perform Well	These sites perform well individually, and relative to other sites within the same settlement. These sites, collectively, are therefore assessed as being compliant with the District Plan strategy.
Sites That Perform Poorly	These sites don't perform well against the sustainability objectives. There are a number of negative impacts that, it is concluded, would not be outweighed by positive impacts. These sites also don't perform well relative to other sites within the same settlement – i.e. there are more sustainable sites within the same settlement that would meet the residual housing requirement before these sites are required. These sites are therefore rejected at this stage, however they may need to be considered again in the future should circumstances change (e.g. increased housing requirement within the settlement, change in strategy, or withdrawal of other sites from the process).
Marginal	These sites perform well individually (positives generally outweigh negatives); however they are not necessarily the most sustainable sites within the settlement. The residual housing requirement can be met sufficiently by 'Sites That Perform Well'

Table 14 - Housing Appraisal - Categories

6.40. A summary of the site appraisals and the categories each site falls into is presented in Table 15.

Table 15 - Summary of Housing Appraisals

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
Sites That Perform Well	1	Burgess Hill	345	St. Wilfrids Catholic Primary School, School Close, Burgess Hill	200	Positive effects are anticipated in relation to housing and the suite of social SA objectives. Notable positives are anticipated in relation to the regeneration and land use objectives and consequently there is not likely to be a negative effect on countryside as the site will make efficient use of a brownfield site.
		Burgess Hill	594	Land South of Southway, Burgess Hill	30	Positive effects are anticipated in relation to housing and the suite of social SA objectives. The site is particularly positive in relation to education and retail.
		Burgess Hill	840	Woodfield House, Isaacs Lane, Burgess Hill	30	Positive effects are anticipated in relation to housing and the suite of social SA objectives.
		Burgess Hill	904	Land to the south of Selby Close, Hammonds Ridge, Burgess Hill	12	Positive effects are anticipated in relation to housing and regeneration SA objectives, whilst minor negative effects are anticipated in relation to the social objectives on the basis that the Northern Arc development will provide new facilities later in the plan period which are not in situ at the current time.
		East Grinstead	196	Land south of Crawley Down Road, Felbridge	200	The site scores well for in relation to housing but the potential for negative effects are noted in relation to biodiversity and countryside. However, very positive effects are anticipated in relation to regeneration.
		East Grinstead	770	Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead	550	The site scores very positively in relation to the housing SA objective and positively in relation to education and retail on the basis of its urban location close to services and facilities. However, the site is a large greenfield site and scores poorly in relation to land use. Although biodiversity constraints are identified there could be potential to seek a net gain through development.
		East Grinstead	847	East Grinstead Police Station, College Lane, East Grinstead	22	Positive effects on the housing SA objective are anticipated on the basis that it is uncertain whether the site can achieve its full indicative yield. However, the site performs well in relation to the social SA objectives and very well in relation to regeneration. The site performs very strongly in relation to land use and regeneration as development will make efficient use of a previously developed site in the urban area.
		Haywards Heath	783	Rogers Farm, Fox Hill, Haywards Heath	25	Positive effects are anticipated in relation to the housing and economic SA objectives but the potential for negative effects is anticipated in relation to the countryside and historic SA objectives, reflecting the site's location on the urban rural fringe.

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
	2	Crawley Down	519	Land north of Burleigh Lane, Crawley Down	50	The site performs positively overall, particularly against the social objectives. Negative impacts are expected on land use, countryside and energy/waste objectives however this is common to all sites assessed (these objectives are generally in conflict with housebuilding, as discussed in section 5 of the report). The yield for this site is greater than the residual required in Crawley Down, however as this is a Category 2 settlement (the second most sustainable category in the settlement hierarchy) this is acceptable. The site is considered appropriate in principle for allocation.
		Cuckfield	479	Land at Hanlye Lane to the east of Ardingly Road, Cuckfield	55	Site 479 performs positively against the social and economic SA objectives as it is well located for access to key services and facilities, helping reduce the need to travel to meet key needs. The site performs positively in relation to the housing objective as it will make a sustainable contribution to meeting the residual requirement in Cuckfield. Potential negative effects on biodiversity via effects on ancient woodland could likely be mitigated through design and layout of the final scheme.
		Hassocks	221	Land to the north of Shepherds Walk Hassocks	130 ⁶	Significant positive effects are anticipated in relation to the housing and regeneration SA objectives, whilst positive effects are also anticipated in relation to the social and economic SA objectives. The presence of some fluvial flood risk on site means the site scores a minor negative in relation to flood risk. Potential for minor negative effects on the countryside SA objective are identified.
	3	Ardingly	832	Land west of Selsfield Road, Ardingly	70	This site performs relatively well against the SA framework. There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact. As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.
		Ashurst Wood	138	Land south of Hammerwood Road, Ashurst Wood	12	Site 138 is well located in relation to local services and facilities, including the school and convenience store, helping reduce the need to travel to meet some day to day needs. There are no historic environment constraints though there could be potential for

⁶ Note: This site has received planning consent, therefore 130 dwellings are counted as 'commitments' and will not be counted against Sites DPD supply, to avoid double counting.

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						negative effects on countryside by virtue of its location in the High Weald AONB. Positive effects in relation to housing are anticipated as the site has potential to make a valuable contribution to wider housing need at Category 3 of the settlement hierarchy.
		Handcross	127	Land at St. Martin Close, Handcross	65⁷	This site performs positively against the social and economic objectives. There is predicted to be a very negative impact on the countryside objective, due to the site's location within the High Weald AONB. However, half of this site has been allocated within the Slaugham Neighbourhood Plan (30 units) with the other half identified as a 'reserve' site. Therefore the principle of developing this site has been accepted, and various mitigation measures have been put in place within the Neighbourhood Plan. Mitigation measures could also be included within the Site Allocations DPD policy in order to reduce its impact.
		Horsted Keynes	184	Land south of St. Stephens Church, Hamsland, Horsted Keynes	30	Major positive effects are anticipated in relation the housing and regeneration SA objectives, along with the education and retail objectives in light of the site's proximity to key services. The site is anticipated to have a minor negative effect on land use and countryside.
		Horsted Keynes	807	Land South of The Old Police House, Birchgrove Road, Horsted Keynes	25	Major positive effects are anticipated in relation the housing and regeneration SA objectives, along with the education and retail objectives in light of the site's proximity to key services. The site is within the AONB and the potential for major negative effects on countryside is therefore identified.
		Sayers Common	829	Land to the north Lyndon, Reeds Lane, Sayers Common	35	Positive effects in relation to the economic SA and housing SA objectives are anticipated. Minor negative effects are anticipated in relation to the land use and countryside SA objectives as the site is greenfield and is found to have limited landscape capacity.
		Scaynes Hill	897	Land to the rear Firlands, Church Road, Scaynes Hill	20	This site scores positively against the social and economic objectives. Whilst there are a number of negative impacts expected, mitigation could address any biodiversity issues. The other negatives are expected as they are in conflict with housing development in general. It is considered that negative effects are outweighed by positives, particularly in light of the significant positive effect on housing supply in the context of Scaynes Hill's

⁷ Note: This site has been partly allocated within the Slaugham Neighbourhood Plan (35 dwellings), therefore 35 dwellings are counted as 'commitments' and will not be counted against Sites DPD supply, to avoid double counting.

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						residual need.
		Turners Hill	854	Withypitts Farm, Selsfield Road, Turners Hill	16	Although Site 854 performs poorly against the countryside criteria due to its location within the High Weald AONB, it is generally accepted (through the adopted District Plan residual housing requirements for settlements) that limited development can be appropriate in principle at settlements which are entirely washed over by the AONB in order to support their continued vitality. As there is a residual need in Turners Hill and Site 854 is small (therefore minimising potential negative impacts) it is considered that the site could make a contribution towards meeting the residual need whilst also minimising negative effects on the AONB.
	4	Ansty	644	Ansty Cross Garage, Cuckfield Road, Ansty	12	The site performs poorly in relation to health, education and transport as it is located beyond a reasonable walking distance from healthcare and school facilities, reflecting Ansty's position at Category 4 of the settlement hierarchy. Although the site has no heritage sensitivity and is outside the AONB, there is limited landscape capacity at the settlement and the site score negatively in relation to countryside as a result. However, this is mitigated to an extent by the fact that the site is previously developed and not require any land take at the edge of the village, resulting in a positive score in relation to land use. Positive effects are anticipated in relation to the housing objective as the site will contribute to meeting the residual need at Category 4.
Sites That Perform Poorly		Burgess Hill	4	Wintons Farm, Folders Lane, Burgess Hill	13	The site performs notably poorly in relation to the land use SA objective, on the basis that it could result in the loss of an existing leisure facility, and poorly in relation to flood risk on the basis of surface water flooding. Positive effects are anticipated in relation to housing and the suite of social SA objectives.
	1	Burgess Hill	646	The Garage, 1 Janes Lane, Burgess Hill	9	Positive effects are anticipated in relation to housing and the suite of social SA objectives. The site is particularly positive in relation to education and retail. Notable positives are anticipated in relation to the regeneration and land use objectives and consequently there is not likely to be a negative effect on countryside as the site will make efficient use of a brownfield site.
		East Grinstead	224	Land at Brooklands Park, west of Orchard Way, East Grinstead	15	Uncertain effects on the housing SA objective are anticipated on the basis that it is uncertain whether the site can achieve its full indicative yield. However, the site performs well in relation to the social SA objectives and very well in relation to regeneration. However, as the site is greenfield it performs poorly in relation to

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SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						land use.
		East Grinstead	595	Land at Brookhurst, Furze Lane, East Grinstead	7	The site performs strongly in relation to housing, the social SA objectives and regeneration, though is anticipated to have a minor negative effects on land use and countryside.
		East Grinstead	763	Carpet Right, 220 - 228 London Road, East Grinstead	24	Uncertain effects on the housing SA objective are anticipated on the basis that it is uncertain whether the site can achieve its full indicative yield. However, the site performs well in relation to the social SA objectives and very well in relation to regeneration. The site performs very strongly in relation to land use and regeneration as development will make efficient use of a previously developed site in the urban area.
		Haywards Heath	618	MSDC Car Park, north of Oaklands Road	8	Positive or significant positive effects are anticipated in relation to the housing, economic and social objectives on the basis of the site's excellent access to town centre services and facilities, including public transport.
		Haywards Heath	988	Land to the north of Old Wickham Lane, Haywards Heath	60	The site performs positively against the social objectives although is distant from health facilities. There is potential for very negative impacts to arise against the Historic objective due to its proximity to two Grade II* listed buildings. Overall the positives and negatives are finely balanced; it is a marginal site given this conclusion and its position within the settlement hierarchy.
	2	Cuckfield	227	Land to the north of Glebe Road, Cuckfield	84	The site performs very strongly in relation to the social SA objectives on the basis of its location close to services and facilities in Cuckfield. Minor negative effects in relation to land use and countryside are anticipated on the basis of the site's greenfield location and low landscape capacity.
		Cuckfield	567	Land to East of Polestub Lane, Cuckfield	120	The site performs very strongly in relation to the social SA objectives on the basis of its location close to services and facilities in Cuckfield. Minor negative effects in relation to land use and countryside are anticipated on the basis of the site's greenfield location and low landscape capacity.
		Hurstpierpoint	164	Land to the rear of 78 Wickham Hill, Hurstpierpoint	18	The site performs strong in relation to the economic SA objectives. The site records a neutral performance against the housing SA objective as there is uncertainty around the ability of the site to deliver growth over the plan period. There is no effect on the historic SA objective, though a minor negative is anticipated in relation to the countryside and land use SA objectives.
		Lindfield	983	Land at Walstead Grange, Scamps Hill, Lindfield	270	The site performs positively against the social objectives. Lindfield has met its housing need, therefore provision of housing on this

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
3						site would be beyond the requirement at this location. However, the site performs negatively against the environmental objectives, particularly impacting flood risk, landscape and ancient woodland. The scale of this site is also likely to have a very negative impact on the land use objective. Overall, the negatives likely to arise from this site are not likely to be outweighed by the positives. It is likely that better performing sites are available within this settlement tier, or the tier above.
		Bolney	264	Land south of Ryecroft Road, Bolney	5	The site's performance in relation to the housing objective is positive, though there is a major negative in relation to the historic environment objective on the basis of the site's listed building and conservation area constraints. Performance against landscape and countryside objectives are negative given the open, rural character of the site and its contribution to the setting and character of Bolney.
		Bolney	526	Land east of Paynesfield, Bolney	30	The site performs notably poorly against the historic environment objective and it is considered that this would not outweighed by the social benefits of the provision of a relatively modest number of new dwellings. The positives of allocating this site are therefore outweighed by the negatives. It is considered that there are more positively performing sites within this settlement tier, or within the tier above.
		Bolney	543	Land West of London Road (north), Bolney	81	The site's performance in relation to the housing objective is notably strong given the significant contribution the site would make towards housing need. Performance against landscape and countryside objectives are negative given the open, rural character of the site and its contribution to the setting and character of Bolney.
		Bolney	741	Land to west of London Road, Bolney	24	The site's performance in relation to the housing objective is uncertain, whilst performance against landscape and countryside objectives are negative given the open, rural character of the site and its contribution to the setting and character of Bolney.
		Horsted Keynes	216	Land at Police House Field, Birch Grove Road/Danehill Lane, Horsted Keynes	10	Major positive effects are anticipated in relation the housing and regeneration SA objectives, along with the education and retail objectives in light of the site's proximity to key services. The site is within the AONB and the potential for major negative effects on countryside is therefore identified.
		Sayers Common	491	Land south of Furzeland Way, Sayers Common	12	Positive effects in relation to the economic SA objectives are anticipated, though performance in relation to the housing SA

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						objective is uncertain in light of uncertainty over the development potential of the site. Minor negative effects are anticipated in relation to the land use and countryside SA objectives as the site is greenfield and is found to have limited landscape capacity.
		Sayers Common	613	Land at Whitehorse Lodge, Furzeland Way, Sayers Common	9	Positive effects in relation to the economic SA objectives are anticipated, though performance in relation to the housing SA objective is uncertain in light of uncertainty over the development potential of the site. Minor negative effects are anticipated in relation to the land use and countryside SA objectives as the site is greenfield and is found to have limited landscape capacity.
		Turners Hill	474	Land adjacent to 18 East Street, Turners Hill	6	Site 474 performs generally well in relation to the SA framework with the notable exception of potential negative effects on landscape as a result of its location in the AONB and minor negative effects on historic environment due to its proximity to multiple Grade II listed buildings. Significantly, however, there are unknown effects in relation to housing, reflecting an uncertain deliverability of the site. Uncertain effects on housing are considered to tilt the overall performance of the site towards the negative as other sites at Turners Hill with broadly similar effects in relation to other objectives can deliver housing with greater certainty, thereby performing more positively than Site 474 overall.
Marginal	1	Burgess Hill	557	Land south of Folders Lane and east of Keymer Road, Burgess Hill	200	Positive effects are anticipated in relation to housing and the suite of social SA objectives.
		Burgess Hill	738	Land east of Greenacres, Keymer Road and south of Folders Lane	100	Positive effects are anticipated in relation to housing and the suite of social SA objectives.
		Burgess Hill	827	Land South of 96 Folders Lane, Burgess Hill	40	Positive effects are anticipated in relation to housing and regeneration SA objectives, whilst minor negative effects are anticipated in relation to the social objectives on the basis that the Northern Arc development will provide new facilities later in the plan period which are not in situ at the current time.
		East Grinstead	998	Old Court House, Blackwell Hollow, East Grinstead	12	The site performs well in relation to the majority of SA objectives as it is a brownfield site in a sustainable location at a Tier 1 settlement.
		Haywards Heath	503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	630	In light of the potential for significant levels of growth at the site, including delivery of new community infrastructure, schools and healthcare, major positive effects are anticipated in relation to the housing and social SA objectives, and positive effects are

SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						anticipated in relation the economic SA objectives. The potential for major negative effects on land use is identified given that the site is almost entirely greenfield and is a significant scale.
	2	Hassocks	210	Land opposite Stanford Avenue, London Road, Hassocks	45	Positive effects are anticipated in relation to the housing and regeneration SA objectives and also anticipated in relation to the social and economic SA objectives. Potential for minor negative effects on the countryside SA objective are identified.
		Hurstpierpoint	13	Land west of Kemps, Hurstpierpoint	114	The site performs notably positively in relation to the housing and economic SA objectives, though poorly in relation to land use, countryside and historic SA objectives on the basis of its greenfield location in the setting of a Grade II*-listed farmhouse
		Hurstpierpoint	19	Land east of College Lane, Hurstpierpoint	165	The site performs notably positively in relation to the housing and economic SA objectives, though poorly in relation to land use, countryside and historic SA objectives on the basis of its greenfield location in the setting of a Grade II*-listed farmhouse
	3	Sayers Common	830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	100	Positive effects in relation to the economic SA and housing SA objectives are anticipated. Negative effects are anticipated in relation to the land use and countryside SA objectives as the site is greenfield and is found to have limited landscape capacity.
	4	Ansty	576	Land at Ansty Farm, Land north of The Lizard, (Site A), Cuckfield Road, Ansty	75	The site performs poorly in relation to health, education and transport as it is located beyond a reasonable walking distance from healthcare and school facilities, reflecting Ansty's position at Category 4 of the settlement hierarchy. Although the site has no heritage sensitivity and is outside the AONB, there is limited landscape capacity at the settlement and the site score negatively in relation to countryside as a result. This is exacerbated by the fact the site is greenfield and would necessitate land take at the edge of the village, resulting in a negative score in relation to land use. Positive effects are anticipated in relation to the housing objective as the site will contribute to meeting the residual need at Category 4.
		Ansty	631	Challoners, Cuckfield Road, Ansty	10	The site performs poorly in relation to health, education and transport as it is located beyond a reasonable walking distance from healthcare and school facilities, reflecting Ansty's position at Category 4 of the settlement hierarchy. Although the site has no heritage sensitivity and is outside the AONB, there is limited landscape capacity at the settlement and the site score negatively in relation to countryside as a result. This is exacerbated by the fact the site is greenfield and would necessitate land take at the

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SA	Cat	Settlement	SHELAA ID#	Site	Yield	Reasons
						edge of the village, resulting in a negative score in relation to land use. Positive effects are anticipated in relation to the housing objective as the site will contribute to meeting the residual need at Category 4.
		Ansty	784	Extension to allocated Land at Bolney Road, Ansty	45	The site performs poorly in relation to health, education and transport as it is located beyond a reasonable walking distance from healthcare and school facilities, reflecting Ansty's position at Category 4 of the settlement hierarchy. Although the site has no heritage sensitivity and is outside the AONB, there is limited landscape capacity at the settlement and the site score negatively in relation to countryside as a result. This is exacerbated by the fact the site is greenfield and would necessitate land take at the edge of the village, resulting in a negative score in relation to land use. Positive effects are anticipated in relation to the housing objective as the site will contribute to meeting the residual need at Category 4.

	Total Sites	Total Yield
Perform Well	20	1,424
Perform Poorly	19	805
Marginal	12	1,536

6.41. In total the sites appraised as performing well and therefore having potential for allocation would yield 1,424 dwellings. This represents an excess of 144 dwellings above the residual amount required of 1,280.

6.42. In terms of the spatial strategy set out in DP4/DP6:

Cat	Settlement	Residual	Supply	Difference	Category Residual	Category Supply	Category Difference
1	Burgess Hill	0	272	272	706	1069	363
	East Grinstead	706	772	66			
	Haywards Heath	0	25	25			
2	Cuckfield	198	55	-143	198	105	-93
	Hassocks	0	0	0			
	Hurstpierpoint	0	0	0			
	Lindfield	0	0	0			
	Copthorne	0	0	0			
	Crawley Down	0	50	50			
3	Albourne	36	0	-36	371	238	-133
	Ardingly	16	70	54			
	Ashurst Wood	0	12	12			
	Balcombe	18	0	-18			
	Bolney	30	0	-30			
	Handcross	0	30	30			
	Horsted Keynes	70	55	-15			
	Pease Pottage	0	0	0			
	Sayers Common	15	35	20			
	Scaynes Hill	119	20	-99			
	Turners Hill	60	16	-44			
	Sharpthorne	4	0	-4			
	West Hoathly	4	0	-4			
4	Ansty	0	12	12	5	12	7
	Staplefield	0	0	0			
	Slaugham	0	0	0			
	Twineham	5	0	-5			
	Warninglid	0	0	0			
Total: 20 sites		1,507	1,424	144			

Table 16 - Supply from 20 'constant' Sites

Site Allocations – Reasonable Alternative Approaches

6.43. By allocating the 20 sites that perform well individually and on a settlement basis, the residual housing need of 1,280 would be met with a small over-supply of 144 units. Overall, the collection of sites is largely consistent with the spatial strategy at a settlement category level. Whilst there is a shortfall at Category 3, this can be met by an over-supply at Category 1. As Category 1 is the most sustainable settlement category, and under-supply should be met at categories higher-up in the settlement hierarchy, this is acceptable.

6.44. The allocation of the 20 sites that perform well represents the minimum level of growth required by the Site Allocations DPD. This represents the first ‘Reasonable Alternative’ approach to allocating sites and should therefore be appraised.

6.45. Whilst there is a small over-supply of 144 units from the 20 sites, this may not be a sufficient buffer should sites fall out of the allocations process between now and adoption (for example, due to delivery issues, reduction in yield, or any other reasons identified during consultation, examination or the evidence base). Therefore, it is sensible to look at alternative approaches which would deliver an increased number of dwellings and therefore more robustness in overall supply at this stage.

6.46. It is not anticipated that an increase in supply should come from the 17 sites that performed poorly. There are clear and justifiable reasons to rule these sites out and there are more suitable and sustainable sites to choose from. However, there is potential for any increased supply to come from the 12 ‘Marginal’ sites – these performed well individually but were not originally required, as residual needs (in total and by settlement) could be met by allocating sites that performed better against the sustainability framework.

6.47. The 12 ‘Marginal’ sites have therefore been examined in more detail, in the context of their potential for contributing towards an increased supply.

Cat	Sites	Justification
4	<ul style="list-style-type: none"> Land at Ansty Farm, Land north of The Lizard, Cuckfield Road, Ansty (75 units) Challoners, Cuckfield Road, Ansty (10 units) Extension to allocated Land at Bolney Road, Ansty (45 units) 	Whilst these sites perform positively individually, the sites are in the lowest category in the hierarchy. Ansty has met its residual requirement. Should further growth be required, ideally this would be found at a more sustainable settlement. The yields from these sites would not achieve suitable ‘higher growth’. It is therefore concluded that it is not reasonable to allocate these sites to achieve higher growth.
3	<ul style="list-style-type: none"> Land to the west of Kings Business Centre, Reeds Lane, Sayers Common (100 units) 	Whilst this site performs well individually, there is only a small residual requirement at Sayers Common and this has been exceeded by a site that performs well. Sayers Common is within a Category 3 settlement, the second lowest in the hierarchy. Should further growth be required, ideally this would be found at a more sustainable settlement.
2	<ul style="list-style-type: none"> Land opposite Stanford Avenue, London Road, Hassocks (45 units) Land west of Kemps, Hurstpierpoint (114 units) Land east of College Lane, Hurstpierpoint (165 units) 	Two of the sites (Hurstpierpoint) generally perform negatively on environmental objectives, notably the impact a site of this size would likely have on heritage (there is a listed building adjacent). The site at Hassocks is on the edge of an Air Quality Management Area, and may impact upon it. Hassocks need has been exceeded by better performing sites, including a strategic allocation within the District Plan.
1	<ul style="list-style-type: none"> Land south of Folders Lane and east of Keymer Road, Burgess Hill (200 units) Land east of Greenacres, Keymer Road and south of Folders Lane (100 units) Land South of 96 Folders Lane, Burgess Hill (40 units) 	Two of the three sites at Burgess Hill are adjacent to each other and could be considered collectively, totalling 300 units. Burgess Hill has met its residual need, however these sites perform well. Haywards Heath Golf Course does not

	<ul style="list-style-type: none"> • Old Court House, Blackwell Hollow, East Grinstead (12 units) • Haywards Heath Golf Course, High Beech Lane, Haywards Heath (630 units) 	<p>perform as well as other sites within Haywards Heath; however there are no significant negative impacts that are not outweighed by positives. Subsequent to the nomination of the Old Court House site at East Grinstead, the Council was advised that the site could no longer be assumed to be available for allocation and the site was consequently not considered further. This left just the 3 sites at Folders Lane and the Golf Course site in contention.</p> <p>These 4 sites are located in the most sustainable settlements, being in Category 1. Additional growth should ideally be found in the most sustainable locations, therefore these sites should be considered as contributing towards additional growth scenarios.</p>
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Table 17 - Summary of Marginal Sites

6.48. It is therefore concluded that, should additional sites be required, these should ideally be drawn from sites in the highest settlement category in the hierarchy. These sites perform well, and would mean focusing additional growth (beyond that required to meet the residual housing requirement) at the most sustainable locations using the most sustainable sites still in the process.

Cat	Settlement	ID	Site	Yield
1	Burgess Hill	557	Land south of Folders Lane and east of Keymer Road, Burgess Hill	200
	Burgess Hill	738	Land east of Greenacres, Keymer Road and south of Folders Lane (formerly part of site 557)	100
	Burgess Hill	827	Land South of 96 Folders Lane, Burgess Hill	40
	Haywards Heath	503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	630

Table 18 - Marginal Sites in Category 1

6.49. As sites #557 and #738 are adjacent to each other and share a boundary, it is sensible to combine the two in order to deliver a comprehensive scheme totalling 300 units. This approach has been discussed and agreed by the two site promoters. Therefore, the two sites can be considered as one. Site #827 is also located on Folders Lane, adjacent to a site currently being built-out, potentially sharing the access. Therefore, it is sensible to consider the three 'Folders Lane' sites as a collection.

6.50. The potential sites at Category 1 that could be allocated to supplement housing supply are therefore the combined sites at Folders Lane, Burgess Hill and Haywards Heath Golf Course, Haywards Heath. It is not appropriate to allocate both of these sites as this would over-provide (as in total they would equate to 970 units) and would lead to a significant unbalance of sites to be delivered at Category 1, however allocating the combined site at Folders Lane or the Golf Course would help supplement housing supply with a sufficient buffer over the residual required.

6.51. Assuming that the selection of 20 sites in Step 1 are constants, there are three reasonable alternatives to meeting the residual housing requirement in full, with varying levels of contingency. The three reasonable alternative options are therefore:

Option	Sites	Total Supply	Additional Supply (above residual)
A	20 'Constant Sites'	1,424	+144
B	20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites)	1,764	+484
C	20 'Constant Sites' + Haywards Heath Golf Course	2,054	+774

Table 19 - Housing Options

Site Selection				
Reasonable Alternatives for Assessment				
Option A: 20 'Constant Sites'. 1,424 dwellings.				
Option B: 20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites). 1,764 dwellings				
Option C: 20 'Constant Sites' + Haywards Heath Golf Course. 2,054 dwellings.				
Objective	A	B	C	Assessment
1 - Housing	+	++	++	All options meet the residual housing requirement, therefore impact positively on this objective. Options (b) and (c) provide more certainty that housing need would be met, as they provide a healthy buffer above the minimum amount of development required. This provides a level of contingency should some sites not be delivered as expected (either in entirety, or with a reduced yield).
2 - Health	+	++	+	The 20 constant sites have been selected according to their consistency with the spatial strategy, focusing on higher tier settlements. The collection of sites is largely well connected to health, education and retail facilities.
3 - Education	+	++	+	Option (b) performs more positively against these objectives, as the sites at Folders Lane are in close proximity to each of these facilities.
4 - Retail	+	++	+	
5 - Communities	+	+	+	All options would provide sufficient housing, spread across the district according to the settlement hierarchy and District Plan strategy. This enables families to grow in areas where need is derived from, helping existing communities to grow.
6 - Flood Risk	0	0	0	None of the options are likely to have any negative impacts on flood risk. All sites selected will need to ensure there is no risk from flooding.
7 - Land Use	-	-	--	All options would involve significant development on greenfield sites, and are therefore likely to have negative impacts on this objective. In particular, the yield associated with option (c) is likely to have a greater impact on this objective.
8 - Biodiversity	?	?	-	Options (a) and (b) include sites that may have a negative impact on biodiversity, although policy requirements for mitigation should reduce any negative impacts. Option (c) in particular includes a site that contains ancient woodland and is adjacent to a designated Local Wildlife Site; although these could be mitigated there is a higher prospect of negative impacts upon this objective.
9 - Countryside	-	-	-	Whilst some sites have a greater impact on landscape

				and designated areas (AONB) than others, each have been assessed as having ‘low impact’ overall. There are no significant differences between the three options on this objective.
10 - Historic	?	?	?	There are no negative impacts expected from any of the three options.
11 - Transport	?	?	?	There are no ‘severe’ highways impacts expected from any of the three options. Policy requirements could ensure access or highways mitigation is provided to ensure no severe impacts arise.
12 - Energy/Waste	-	-	-	All options will increase the amount of waste generated, albeit that sustainable construction techniques can be utilised and waste recycling will be employed to minimise any impacts. There are no significant differences between the three options.
13 - Water	-	-	-	All options will increase demand on water supply and for wastewater treatment. There are no significant differences between the three options.
14 - Regeneration	+	++	+	Option (b) performs more positively against this objective, as the sites at Folders Lane are in close proximity to the town centre.
15 - Employment	+	+	+	All options would provide sufficient housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	++	++	All options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon. Additional population increases (i.e. options (b) and (c)) within the district will have positive knock-on effects for local businesses, retail, and entertainment and community facilities, supporting economic growth.
Summary of Appraisal:				
<p>All three options would meet the residual housing need; therefore perform positively in relation to the housing objective. Options (b) and (c) allow for more growth than needed, therefore provide more certainty that the housing need will be met.</p> <p>The 20 ‘constant’ sites have been selected due to their performance against the sustainability objectives, but also their consistency with the spatial strategy. In terms of the social objectives, all options are largely positive as they involve focussing growth to settlements higher in the settlement hierarchy – where the majority of facilities and services exist. Option (b) in particular involves the development south of Folders Lane, which is largely within 15 minutes’ walk of Burgess Hill town centre, health facilities and a primary school. This also has positive impacts on the objective concerned with encouraging town and village centre regeneration, due to its close proximity to the town centre. Haywards Heath Golf Course (associated with Option (c)) is distant from existing services and facilities.</p> <p>All options are likely to have negative impacts on the environmental objectives. This is inevitable due to the conflict between preserving the environment and building, the majority of which are greenfield sites. However, mitigation could be provided to minimise impacts on landscape, biodiversity, heritage and transport. Option (c) however proposes significantly more development on greenfield land and is likely to have more negative impacts on biodiversity due to the presence of ancient woodland within the Golf Course site, and its adjacency to a Local Wildlife Site.</p> <p>Options (b) and (c) are more likely to have positive impacts on economic growth objectives due to their higher yield than option (a).</p>				
Cross-Border Impacts:				

<p>The majority of sites will have no impact cross-boundary, however some sites proposed are located close to the District and County boundary (notably in the north of the district, adjacent to Tandridge). Any impacts are likely to be confined to transport matters, which are tested within the Mid Sussex Transport Model. Any impacts from these sites will be discussed with the relevant authority.</p>	
<p>Recommendations and Mitigation Measures:</p>	
<p>There are a number of negative environmental impacts expected to arise as a result of all three options, which is inevitable due to the conflict between preserving the environment and housebuilding. Mitigation measures should be required within the policy requirements for each site, and should be assessed on a site-by-site basis based on the detailed information provided for each site, and its individual assessments in Appendix 4.</p>	
<p>Preferred Option:</p>	<p>B</p>

6.52. Following the assessment of all reasonable alternative options for site selection, the preferred option is option B. Although option A would meet residual housing need, option B proposes a sufficient buffer to allow for non-delivery, therefore provides more certainty that the housing need could be met. Whilst option C also proposes a sufficient buffer, it is at the expense of negative impacts arising on environmental objectives. The level of development within option C is approximately 60% above the residual housing need, the positives of delivering an excess of this amount within the Site Allocations DPD is outweighed by the negative environmental impacts associated with it.

7. Employment – Requirement, Site Selection, Preferred Options

Employment – Need

- 7.1. District Plan policy **DP1: Sustainable Economic Development** sets out the adopted position relating to employment need. This states that the number of jobs expected to arise as a result of increased housebuilding was 543 jobs per annum, therefore closely matching the 521 jobs per annum anticipated through forecasting. The policy also allocated 25ha of employment land at Burgess Hill, on a site now known as “The Hub”. This allocation is partly complete, with planning applications in place to deliver the remainder.
- 7.2. In response to updated employment forecasting, changes in the employment market and changes to national policy, the Council commissioned an update to the employment need evidence. Site Selection Paper 4: Employment describes the methodology and processes followed.
- 7.3. This work has shown that an additional **10-15ha** of B-Class employment land is required above the amount identified and allocated within the District Plan (a range is provided due to some of the assumptions made, therefore the Site Allocations DPD should aim to supply towards the top of the range).
- 7.4. Note that the employment need figure does not take account of the proposed Science and Technology Park allocated as a ‘broad location’ to the west of Burgess Hill in policy DP1. The aim of this site is to serve a niche market, and to help meet a wider regional need. It will, of course, provide jobs for those residents already economically active within Mid Sussex but is being treated as a separate instance – it is intended that the employment need will be met but allocating additional employment sites within the Site Allocations DPD.

Employment – Strategy

- 7.5. The Council held a ‘call for sites’ in Autumn 2017, requesting landowners/agents/developers to submit sites for their assessment as a site for employment (B1/B2/B8 uses). The SHELAA was published in April 2018. In accordance with the NPPF and Planning Practice Guidance (2a-026-20190220), the SHELAA contains an assessment of existing employment sites as well as new sites. The purpose of including existing employment sites is to assess whether they are still appropriate (in market terms, for instance) for employment, or whether there is potential for expansion, intensification or redevelopment to make best use of land.
- 7.6. A total of 94 sites were assessed within the SHELAA. This comprised 69 existing sites, and 25 sites put forward for assessment for their potential for allocation. Since the SHELAA was published, 5 of the ‘new’ sites have now been ruled out from further consideration as they have received planning permission or are now committed to other uses; there are also 2 options for the Science and Technology Park (considered separately).
- 7.7. Additionally, six further proposed employment sites were nominated through representations made through Regulation 18 consultation.
- 7.8. Therefore, there are a total of 24 potential sites which will be assessed for their potential for allocation, and would contribute to meeting the 10-15ha employment need.
- 7.9. Three potential strategies for meeting employment need have been considered. These represent reasonable alternatives for assessment in the Sustainability Appraisal, and are appraised below:
 - Allocate sufficient ‘new’ employment sites to meet the 10-15ha

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- Meet the need in part through allocating 'new' sites and relying on 'windfall' from expansion/redevelopment/intensification of existing sites to meet the remainder
- 'Do Nothing' i.e. solely rely on the Science and Technology Park to meet any remaining need (as well as contributing to wider regional need).

Employment - Strategy				
Reasonable Alternatives for Assessment				
Option A: Allocate sufficient 'new' employment sites to meet the 10-15ha				
Option B: Meet the need in part through allocating 'new' sites and relying on 'windfall' from expansion/redevelopment/intensification of existing sites to meet the remainder				
Option C: 'Do Nothing' i.e. solely rely on the Science and Technology Park to meet any remaining need (as well as contributing to wider regional need).				
Objective	A	B	C	Assessment
1 - Housing	0	0	0	There are no direct impacts expected against this sustainability objective.
2 - Health	0	0	0	There are no direct impacts expected against this sustainability objective.
3 - Education	0	0	0	There are no direct impacts expected against this sustainability objective.
4 - Retail	+	?	?	There is a link between the location of employment sites and this objective, as workforce use retail facilities close to where they work. Whilst all three options should increase the use of retail areas, there is more certainty through the allocation of new sites as opposed to relying on windfall which may not be delivered.
5 - Communities	++	+	+	The allocation of new employment sites, close to where workforce lives, is a key objective of the District Plan. There is more certainty of delivery through allocating sites as opposed to relying on windfall. There is also more likely to be a spread of development across the district associated with option (a) compared to the other options.
6 - Flood Risk	0	0	0	There are no direct impacts expected against this sustainability objective.
7 - Land Use	-	?	-	It is likely that the new sites required to meet employment need will be on greenfield land, which could lead to negative impacts for option (a), as well as option (c) which is entirely greenfield. As option (b) relies on windfall, and by its definition the location is not yet known, it is unclear what impact it will have on this objective.
8 - Biodiversity	?	?	?	The impact on this objective will only be known once individual sites and their impact on biodiversity features or designations are known.
9 - Countryside	-	?	-	It is likely that the new sites required to meet employment need will be on greenfield land, which could lead to negative impacts for option (a), as well as option (c) which is entirely greenfield. As option (b) relies on windfall, and by its definition the location is not yet known, it is unclear what impact it will have on this objective.
10 - Historic	0	0	0	There are no direct impacts expected against this sustainability objective.
11 - Transport	+	?	?	Allocating sites provides as per option (a) provides more certainty of location, thereby can be modelled within strategic transport modelling to assess the in-combination impact. It is uncertain at this stage the quantity or location

				of redevelopment/expansion/intensification of existing sites (i.e. windfall, option (b)). The transport impacts of the Science and Technology Park will be assessed separately.
12 - Energy/Waste	0	0	0	There are no direct impacts expected against this sustainability objective.
13 - Water	0	0	0	There are no direct impacts expected against this sustainability objective.
14 - Regeneration	+	+	+	All options are likely to increase the opportunity for town and village centre regeneration, although will be dependent on location.
15 - Employment	++	+	?	Option (a) provides more certainty that the employment need will be met, by providing sufficient land to do so. There is less certainty afforded to option (b) as it relies on windfall, which by its nature is uncertain in terms of size and timing of delivery. Option (c) is likely to provide significant job opportunities however by its nature these are likely to be in only certain fields as opposed to all economic uses (B1/B2/B8).
16 - Ec. Growth	++	+	?	Option (a) provides more certainty that the employment need will be met, by providing sufficient land to do so. There is less certainty afforded to option (b) as it relies on windfall, which by its nature is uncertain in terms of size and timing of delivery. Option (c) is likely to provide significant land for new employment occupiers however by its nature these are likely to be in only certain fields as opposed to all economic uses (B1/B2/B8).
Summary of Appraisal:				
<p>There are a number of positive benefits expected for all three options as they all involve providing more land for employment purposes, encouraging economic growth and the potential for businesses to grow.</p> <p>However, there is more certainty with option (a). This option would involve identifying sufficient land for employment uses to meet the identified need of 10-15ha. The Site Allocations DPD can therefore clearly demonstrate that there is sufficient employment land in the district, and through the Site Selection and Sustainability Appraisal process can ensure the most suitable and sustainable sites are selected to meet this need.</p> <p>Option (b) would provide less certainty as it relies on windfall, by its nature there is no certainty as to where additional land will be provided, to what extent, and no certain timescale. It could mean that the need of 10-15ha isn't met by the end of the plan period, leading to an unmet need for employment land.</p> <p>Option (c) relies on the Science and Technology Park (assessed separately within the Sustainability Appraisal). This use is for a wider, strategic regional need rather than to meet local needs.</p>				
Cross-Border Impacts:				
None expected.				
Recommendations and Mitigation Measures:				
Additional sites should contain criteria to ensure minimised impacts on landscape, countryside and biodiversity.				
Preferred Option:	A			

7.10. It is concluded that the most sustainable approach is for the Site Allocations DPD to allocate sufficient 'new' employment sites in order to meet the revised employment need of 10-15ha.

Any additional employment land gained from intensification/redevelopment/expansion of existing sites will be treated as windfall rather than being relied upon to meet employment need. The Science and Technology Park will continue to be treated as a separate entity and won't be relied upon to contribute towards Mid Sussex needs, whilst recognising that it will provide employment opportunities for Mid Sussex residents and businesses.

Employment – Site Selection

7.11. Following the conclusion of the appraisal above, the 18 potential 'new' employment sites were assessed through Site Selection Paper 2.

7.12. The Council consulted upon, and published Site Selection Paper 2 in December 2018. This paper sets out the methodology by which the Council assessed sites, with the aim of selecting the most suitable, sustainable and deliverable sites for allocation. Site Selection Paper 2 sets out 19 criteria to assess individual sites against. The criteria fall into three categories - planning constraints, accessibility and market/jobs demand.

7.13. The site assessment conclusions are published within Site Selection Paper 4: Employment.

7.14. Following the site assessment work, and upon analysing the various sites that had been submitted, it has been concluded that the site options fit into three broad spatial categories:

- Small extensions at Bolney Grange
- Large sites in the vicinity of the A2300, Burgess Hill
- 'Other' smaller sites spread across the district

'At Bolney Grange'	'A2300 Vicinity'	'Other'
24 - Land at Stairbridge Lane (South of Bolney Grange), Bolney (5.5ha)	602 - Land at Northlands Farm, A2300/A23, Hickstead (7.25ha)	192 - Pease Pottage Nurseries, Brighton Road, Pease Pottage (1ha)
906 - Undeveloped land (south) at Bolney Grange Business Park, Stairbridge Lane, Bolney (0.6ha)	946 - Northlands Farm, Stairbridge Lane, Bolney (14.5ha)	665 - Hangerwood Farm, Foxhole Lane, Bolney (9.2ha)
907 - Undeveloped land (east) at Bolney Grange Business Park, Stairbridge Lane, Bolney (0.2ha)	947 - Land between A2300 and Jobs Lane, Bolney (2.04ha)	826 - Burnside Centre, Victoria Road, Burgess Hill (0.96ha)
931 - Extension (east) to Bolney Grange Business Park, Stairbridge Lane, Bolney (0.7ha)	948 - Land south of A2300 adjacent to Pookbourne Lane (10ha)	864 - Marylands Nursery, Cowfold Road, Bolney (2.4ha)
		865 - Bolney Nursery, Cowfold Road, Bolney (0.8ha)
		888 - Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage (2.3ha)
		912 - Site of Former KDG, Victoria Road, Burgess Hill (1.1ha)
		913 - The Walled Garden, behind the Scout Hut, London Road, Balcombe (0.3ha)
		915 - Area south of

		Redbridge Lane at junction with London Road, Balcombe (1.2ha)
		940 - Land north of the A264 at Junction 10 of M23 (Employment Area) (2.7ha)
		991 - Extension to Silverwood, Copthorne (10-15ha)
		994 - Friday Farm, Copthorne (2.08ha)
		996 - Extension to Barn Court, Copthorne (3.73ha)
		999 - Additional employment land north of A264 Copthorne (3.5ha)
		1005 – Land at Hazeldene Farm, north of Orchard Way, Warninglid (2.9ha)
		1007 – Crawley Down Garage (5.44ha)

Table 20 - Employment Sites by Broad Location

7.15. These three broad spatial options represent reasonable alternatives for assessment in the Sustainability Appraisal, in order to determine the most sustainable approach to allocating additional employment sites.

Employment – Broad Spatial Options				
Reasonable Alternatives for Assessment				
Option A: Small extensions at Bolney Grange				
Option B: Large sites in the vicinity of the A2300, Burgess Hill				
Option C: 'Other' smaller sites spread across the district				
Objective	A	B	C	Assessment
1 - Housing	0	0	0	There are no direct impacts expected on this objective.
2 - Health	0	0	0	There are no direct impacts expected on this objective.
3 - Education	0	0	0	There are no direct impacts expected on this objective.
4 - Retail	0	0	?	Options (a) and (b) are remote from existing town and village centres. Option (c), dependent on the sites chosen, may have positive impacts on this objective should sites be located close to existing retail locations.
5 - Communities	+	0	+	Option (a) involves extensions to an existing site, which currently employs a number of local residents. This option would provide the opportunity for existing businesses to grow. Option (c), dependent on the sites chosen, should provide a spread of development across the district providing more opportunities for people to work close to where they live.
6 - Flood Risk	0	-	0	Option (b) includes sites that have significant areas of historic flood risk, or the potential for flooding in the future due to areas of flood risk 2/3 within the site boundaries.

7 - Land Use	?	-	+	Option (a) involves some intensification of a brownfield site, although most of the extensions are on greenfield land. The impacts against this objective are therefore uncertain. Option (b) proposes entirely greenfield sites, and are of a large-scale. Option (c) includes smaller greenfield sites as well as a number of brownfield sites, some of which are within existing employment areas.
8 - Biodiversity	?	?	?	The impact on this objective will only be known once specific sites are chosen.
9 - Countryside	-	-	?	Options (a) and (b) involve development on greenfield sites. Option (c) impacts will be more certain once specific sites are known, however there are sites within the shortlist on brownfield land.
10 - Historic	0	0	0	There are no direct impacts expected on this objective.
11 - Transport	0	--	0	Options (a) and (c) propose smaller-scale sites. In particular, option (c) involves numerous small sites which are spread across the district. Therefore, this is unlikely to have a significant impact on the highways network due to the spread and scale. Option (b) involves larger scale sites on the A2300 – this road is the key link between the A23 and Burgess Hill, and the key route for the Northern Arc, proposed Science and Technology Park and The Hub. Transport impacts associated with these developments is likely to be exacerbated by further development on this link and associated junctions.
12 - Energy/Waste	0	0	0	There are no direct impacts expected on this objective.
13 - Water	0	0	0	There are no direct impacts expected on this objective.
14 - Regeneration	+	+	++	Whilst all options are likely to impact positively on this objective, option (c) proposes a spread across the district, which could have very positive impacts on existing tow and village centres dependant on the sites chosen.
15 - Employment	+	+	++	Option (c) is likely to provide more employment opportunities across the district as a whole compared to the other two options.
16 - Ec. Growth	++	+	++	Option (a) would allow existing businesses at Bolney Grange to expand, as well as allowing for additional businesses to encourage economic prosperity. Option (c) provides a spread of land across the district, therefore encouraging business growth close to existing settlements with their associated workforce.
Summary of Appraisal:				
<p>Options (a) and (c) perform positively against the social and economic objectives as they would encourage existing business to grow as well as encouraging new business use across the district.</p> <p>Whilst option (b) would also encourage new business to the district, this is located in one area (on the edge of Burgess Hill) and would not provide well-needed employment land in other locations – noting that the District Plan strategy involves housing growth at nearly all settlements within the district according to the settlement hierarchy (District Plan policies DP4/DP6) and employment opportunities should be provided to match, where possible.</p> <p>In particular, the location of the sites within option (b) are likely to have negative impacts on the transport objective due to their proximity to the already adopted strategic site (Northern Arc), location for a Science and Technology Park and significant employment allocation in the District Plan (The Hub, currently under construction).</p>				
Cross-Border Impacts:				

None expected.	
Recommendations and Mitigation Measures:	
Additional sites should contain criteria to ensure minimised impacts on landscape, countryside and biodiversity.	
Preferred Option:	A / C

7.16. There are no negative impacts expected from either option A or C. As one of the objectives of the District Plan is to encourage economic growth as well as allowing existing businesses to expand, it is proposed that both options would assist in meeting this objective. Therefore, both options are proposed within the Site Allocations DPD.

7.17. As a result of the above appraisal, the various sites categorised as ‘other’ will be appraised individually to ensure the most suitable and sustainable sites are selected for allocation alongside the collection of small-scale expansions at Bolney Grange.

Site Specific Appraisals

Employment Sites																	
Reasonable Alternatives for Assessment																	
<p>A - Pease Pottage Nurseries, Brighton Road, Pease Pottage (1ha) <i>SHELAA# 192</i> B - Hangerwood Farm, Foxhole Lane, Bolney (9.2ha) <i>SHELAA# 665</i> C - Burnside Centre, Victoria Road, Burgess Hill (0.96ha) <i>SHELAA# 826</i> D - Marylands Nursery, Cowfold Road, Bolney (2.4ha) <i>SHELAA# 864</i> E - Bolney Nursery, Cowfold Road, Bolney (0.8ha) <i>SHELAA# 865</i> F - Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage (2.3ha) <i>SHELAA# 888</i> G - Site of Former KDG, Victoria Road, Burgess Hill (1.1ha) <i>SHELAA# 912</i> H - The Walled Garden, behind the Scout Hut, London Road, Balcombe (0.3ha) <i>SHELAA# 913</i> I - Area south of Redbridge Lane at junction with London Road, Balcombe (1.2ha) <i>SHELAA# 915</i> J - Land north of the A264 at Junction 10 of M23 (Employment Area) (2.7ha) <i>SHELAA# 940</i> K - Extension to Silverwood, Copthorne (1ha) <i>SHELAA# 991</i> L - Friday Farm, Copthorne (2.08ha) <i>SHELAA# 994</i> M - Extension to Barn Court, Copthorne (3.73ha) <i>SHELAA# 996</i> N - Additional employment land north of A264 Copthorne (3.5ha) <i>SHELAA# 999</i> O - Land at Hazeldene Farm, north of Orchard Way, Warninglid (5.44ha) <i>SHELAA# 1005</i> P - Crawley Down Garage (2.9ha) <i>SHELAA# 1007</i></p>																	
Objective	A – PP Nurseries	B – Hangerwood	C – Burnside	D – Marylands	E – Bolney Nursery	F – Cedars	G – Former KDG	H – Walled Garden	I – Redbridge	J – A264 J10	K – Silverwood	L – Friday Farm	M – Barn Court	N – N of A264	O – Hazled Farm	P – C.D. Garage	Assessment
1 - Housing	0	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	Site options (c), (g), (h) and (i) are near or within existing settlements, so employees could live near to their place of work, whereas the rest of the site options are relatively remote from existing settlements or distant from defined settlement boundaries.
2 - Health	0	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	Site options (c), (g), (h) and (i) are near or within existing settlements that are serviced by at least one GP

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																	surgery, whereas the rest of the site options are relatively remote from existing settlements.	
3 - Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	There are no impacts expected for this objective.
4 - Retail	0	0	+	0	0	0	+	+	+	0	+	0	0	0	0	0	+	Site options (c), (g), (h) and (i) are near or within existing settlements that are serviced by at least one convenience store, whereas the rest of the site options are relatively remote from existing settlements.
5 - Communities	0	0	+	0	0	0	+	+	+	0	+	0	0	0	0	0	+	Site options (c), (g), (h), (i), (k) and (p) are near or within existing settlements so would integrate well with existing communities, whereas the rest of the site options are relatively remote from existing settlements.
6 - Flood Risk	0	--	0	0	0	0	0	0	0	0	0	0	0	0	0	0	--	None of the site options have areas at risk from flooding, or have suffered from flooding in the past, apart from site option (b) and site option (p), which are both affected by flood zones 2/3.
7 - Land Use	-	--	++	++	++	++	++	-	-	-	-	?	-	-	-	-	++	Site options (c), (d), (e), (f), (g) and (p) are on previously developed land. Site options (a), (b), (h), (i) and (j), (k), (m), (n) and (o) are all on green field land; (b) is significantly larger in site area than the other options. Site option (l) is partly previously developed though also includes much undeveloped land. In this light effects are uncertain as they will be largely determined by the design and layout of any future scheme.
8 - Biodiversity	-	-	0	0	0	0	0	-	-	0	-	0	-	-	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any site options. Site options (a) and (b) are adjacent to areas of ancient woodland, while

																	options (h), (i), (k), (m) and (n) have 15m ancient woodland buffer within the site.
9 - Countryside	--	-	0	-	-	-	0	--	--	-	-	-	-	-	--	0	Site options (a), (f), (h), (i) and (o) are wholly within the High Weald AONB. Site (f) would have a low impact on the AONB, while the rest would have a moderate impact on it. Options (b), (d), (e), (j), (l), (m) and (n) are all considered to be in areas of low/medium landscape capacity. Option (k) is undeveloped and has some value as a landscape buffer between neighbouring dwellings and the existing Silverwood employment site. Within the built up area, options (c), (g) and (p) are in areas of high landscape capacity.
10 - Historic	0	-	0	0	0	0	0	-	-	0	0	-	-	0	0	-	Site options (b), (h), (i), (l), (m) and (p) are not constrained by a conservation area, but would have a less than substantial harm (low or medium) on nearby listed buildings. All other site options have no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	?	?	?	?	?	?	-	-	?	?	?	?	-	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD. It is uncertain how access can be achieved for options (h), (i) and (n).
12 - Energy/Waste	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	All sites are likely to generate additional waste and use energy; however the exact amount per site is unknown and will depend on any sustainable construction techniques/renewable energy

																		schemes implemented.
13 - Water	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	All sites are likely to use additional water resources; however the exact amount per site is unknown and will depend on any sustainable construction techniques.
14 - Regeneration	+	+	++	+	+	++	++	++	++	++	+	+	+	0	0	++	A number of site options contribute positively to regeneration in their respective locations, however, options (a), (b), (d), (e), (k), (l) and (m) require mitigation in order to ensure the site does not negatively impact neighbouring amenity. Site options (n) and (o) are rural greenfield sites and make no notable contribution to regeneration of their local context or the plan area as a whole.	
15 - Employment	+	+	++	+	+	+	++	0	0	++	+	+	+	0	0	+	Site options (c), (g) are very well related to an existing labour force, located within Victoria Business Park, within the large settlement of Burgess Hill. Due to its close proximity to Crawley and East Grinstead, and its location adjacent to the A23/M23 junction, option (j) also has very good access to labour. Site options (a) (f), (k), (l), (m) and (p) are relatively remote from an existing settlement, but have good access to labour due to their location in proximity Crawley or East Grinstead as well as small settlements nearby. Site options (b), (d) and (e) have access to a smaller labour force, all located somewhat remotely from existing small settlements. Options (h) and (i) are both near to Balcombe, with access to a poor supply of labour in this location. Similarly, site option (o) is rural in location and despite its proximity to the A23 it has a poor supply of local	

																		labour. Site option (n) is in close proximity to Crawley in terms of straight line distance, though it is remote from existing access points means it is unclear how a labour force could access the site.
16 - Ec. Growth	+	+	+	+	+	+	+	0	0	++	+	+	+	0	+	+		Site option (j) contributes very highly to economic growth in the District; due to the proximity of Gatwick Airport and other main settlements, there is likely to be a strong market for employment uses in this area. Site options (h), (i) and (n) contribute poorly to economic growth, as there is likely to be a significant market B-class uses in this location. The other site options all contribute positively to economic growth, as all have good strategic transport links encourages employment opportunities in these areas.

Summary of Appraisal:

The majority of the options are likely to have significant positive impacts on the economic objectives, as to be expected. Although options (h), (i) and (o) propose employment land, there is less of a market for allocations of this size in this location, and there is a reduced labour supply compared to other options. These three options are also likely to have potential for significant negative impacts on the High Weald AONB, whilst options (h) and (i) also have potential for negative effects in relation to biodiversity from proximity to ancient woodland and the historic environment due to their location in proximity to a listed building.

Site options (b) and (p) are the only site options within the reasonable alternatives appraised that have significant areas of fluvial and surface water flood risk which could constrain the feasibility of delivering this site for employment purposes, though the development of employment land in flood risk zones 2 and 3 is not necessarily unacceptable in principle. All other options appraised are unlikely to have any significant impacts on the environmental objectives aside from those expected to arise as a result of conflict between development and protection of the countryside. Site options (c), (d), (e), (f), (g) and (p) benefit from being on previously developed land.

In general, sites (a), (c), (d), (f), (g) and (j) perform positively against the sustainability objectives, and any negative impacts are outweighed by the positives arising.

Cross-Border Impacts:

There are no cross-border impacts expected from any of the options

Recommendations and Mitigation Measures:

A number of negative impacts arise against the environmental objectives, policy requirements will ensure these negative impacts are mitigated or minimised.

Preferred Options

A, C, D, F, G, J

Science and Technology Park

- 7.18. District Plan policy **DP1: Sustainable Economic Development** identifies a broad location to the west of Burgess Hill for a Science and Technology Park (S&TP). The feasibility and potential for a new S&TP was examined in the Burgess Hill Employment Sites Study and potential locations examined in more detail within the S&TP Potential Locations Assessment.
- 7.19. The Burgess Hill Employment Sites Study concluded that the potential for and feasibility of a S&TP should be investigated further. However at a high level, it confirmed the scale and nature of the potential market and alignment to aims of the Local Enterprise Partnership (LEP), Gatwick Diamond and City Deal strategies.
- 7.20. During the District Plan process and initial work on the broad location, there was a single site option presented to the Council – site #801 “Land at Dumbrell’s Farm, south of the A2300”. As this was the only option presented to the Council within the environs of the broad location identified, and no other options were presented within the rest of the district, this site was used as a proxy for the assessment work that accompanied the District Plan.
- 7.21. As part of the Council’s ‘Call for Sites’ exercise for the SHELAA, a second option was presented to the Council – site #949 “Land to the north of A2300”. Both sites are of a similar size, approximately 50ha, and propose comparable levels of employment. They are therefore both considered as Reasonable Alternatives for assessment in the Sustainability Appraisal.

Science and Technology Park – Site Options			
Reasonable Alternatives for Assessment			
Option A: SHELAA #949 “Land to the north of A2300”			
Option B: SHELAA #801 “Land at Dumbrell’s Farm, south of the A2300”			
Objective	A	B	Assessment
1 - Housing	0	0	There are no direct impacts expected against this objective.
2 - Health	0	0	There are no direct impacts expected against this objective.
3 - Education	+	+	Both sites propose links to educational establishments in order to provide opportunities for people to work once leaving school, college or university.
4 - Retail	+	+	Both sites include an element of small-scale retail and community facility provision (convenience store/café/crèche/etc) on-site as an ancillary use to the employment provision, for the benefit of workers on-site and those living locally.
5 - Communities	+	?	Option (a) proposes pedestrian and cycle links directly to the adjacent Northern Arc strategic site, therefore providing a better linkage to this area than option (b).
6 - Flood Risk	-	--	Option (a) includes a small area of flood risk within its northern boundary, although this is likely to be avoided. Option (b) includes a similar amount of flood risk on its southern boundary, although quite a significant area within the western section of the site.
7 - Land Use	-	-	Both sites propose significant use of greenfield land, therefore are likely to have a negative impact on this objective.
8 - Biodiversity	-	--	Due to their scale and greenfield location, both sites are likely to impact negatively on biodiversity and appropriate mitigation must be provided. In particular, option (b) has large areas of ancient

			woodland and accompanying 15m buffer within the site boundary.
9 - Countryside	-	-	Both sites propose significant use of greenfield land, therefore are likely to have a negative impact on this objective. Both options propose landscape mitigation to minimise the impact of the development on the wider landscape.
10 - Historic	0	0	There are no impacts expected against this objective as there are no listed buildings/conservation areas likely to be impacted by these options.
11 - Transport	?	-	Both sites involve significant development which would be accessed by the A2300. Both schemes have proposed an access arrangement – whilst further work will be required to confirm final designs and capacity of these arrangements, option (a) proposes access via an upgrade to an existing roundabout, whereas option (b) proposes an additional junction. The addition of a further junction is more likely to have a negative impact on traffic flow on the A2300 and could cause knock-on delays at other junctions. The Mid Sussex Transport Model anticipates fewer ‘severe’ impacts on junctions for option (a) than (b).
12 - Energy/Waste	+	?	Whilst both options propose green technologies and sustainable energy use, option (a) includes a currently permitted solar farm within the same ownership.
13 - Water	?	?	Both options are likely to increase water usage, although sustainable measures should be in place to minimise impact on this objective.
14 - Regeneration	++	++	Both options are likely to encourage regeneration of town and village centres due to their size, and the potential for the associated workforce to use the facilities, particularly within Burgess Hill Town Centre.
15 - Employment	++	++	Both options will provide significant employment opportunities close to planned development at Burgess Hill, enabling the workforce to live and work in close proximity therefore reducing the need to out-commute.
16 - Ec. Growth	++	++	Both options will contribute to economic growth by providing significant employment land, and encouraging high-value businesses to locate to Mid Sussex.
Summary of Appraisal:			
<p>Both sites will provide significant employment opportunities for the local workforce, as well as meeting employment needs on a wider, regional basis due to the uses proposed. The broad location of a Science and Technology Park was established within the District Plan (DP1) and the benefits of the principle were examined and approved during this process. Whilst both sites are in close proximity, there are a few differences between the two.</p> <p>The main differences relate to the environmental sustainability objectives.</p> <p>Option (b) includes significant areas of flood risk and ancient woodland, whereas option (a) does not. These areas would need to be avoided and mitigated as appropriate, which may reduce the developable area of the site.</p> <p>Of greater significance is the impact on the transport objective. Whilst both sites are likely to increase the level of highways movements on the network, and will be subject to further testing ahead of submission, it is anticipated through the Mid Sussex Transport Model that there will be fewer ‘severe’ junction impacts for option (a) compared to (b). Likewise, the access arrangements proposed for option (a) are favourable compared to (b) due to their potential to have less harmful impact on traffic flow on the A2300. These elements will be subjected to further testing.</p>			
Cross-Border Impacts:			
None expected.			

Recommendations and Mitigation Measures:	
Negative impacts are expected on land use, countryside and biodiversity objectives. Policy requirements should ensure that any negative impact on these is minimised, by requesting sufficient mitigation.	
Preferred Option:	A

7.22. In sustainability terms, site option A “Land to the north of A2300” performs more positively against the objectives than option B, particularly related to transport. Site Selection Paper 4: Employment details the thorough site selection process, which includes non-sustainability considerations, that has taken place to determine the preferred option for allocation within the DPD.

8. Generic Policies – Appraisal of Reasonable Alternatives

8.1. The Site Allocations DPD also intends to contain a number of generic policies. These have been identified as a result of monitoring District Plan policies, or as supplementary to the proposed housing and employment allocations to facilitate delivery. The following policy areas are proposed, and are appraised in full within the Main Report:

- Existing Employment Sites
- Safeguarding of Land for and Delivery of Strategic Highway Improvements
- Wivelsfield Railway Station
- Burgess Hill / Haywards Heath Multifunctional Network
- Air Quality

Existing Employment Sites			
Reasonable Alternatives for Assessment			
Option (a): To have a policy that supplements District Plan Policy DP1: Sustainable Economic Development by providing additional policy requirements relating to the protection of existing employment sites, whilst supporting their expansion where appropriate.			
Option (b): To not have this policy, and therefore rely on District Plan Policy DP1: Sustainable Economic Development .			
Objective	A	B	Assessment
1 - Housing	+	+	Both options have a likely positive impact on the sustainability objective for housing. Local employment sites have a role in supporting the feasibility of new housing in the District, by providing jobs close to where people live.
2 - Health	0	0	Neither option is likely to have a direct impact on this objective.
3 - Education	0	0	Neither option is likely to have a direct impact on this objective.
4 - Retail	+	+	Both options have a likely positive impact on the sustainability objective for retail. Local employment sites have a role in supporting the feasibility of new retail facilities in the District.
5 - Communities	+	+	Both options have a likely positive impact on the sustainability objective for crime. In general, good employment opportunities should encourage social cohesion and reduce inequality.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	++	+	Both options have a positive impact on the sustainability objective for land use because they seek to support best use of existing business floorspace in the District, thereby decreasing the likelihood of the need for new employment sites in greenfield locations. Option (a) goes further than Option (b) to protect existing employment sites, which makes best use of existing brownfield land, and provides a criteria-based policy framework that allows for appropriate expansion of existing employment sites, both in and outside the built-up area, but with stricter criteria for development outside the built-up area.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	++	+	Both options have a positive impact on the sustainability objective for countryside because they seek to support best use of existing business floorspace in the District, thereby decreasing the

			likelihood of the need for new employment sites in the countryside. Option (a) goes further than Option (b) to protect existing employment sites, which makes best use of existing brownfield land, and provides a policy framework that allows for appropriate expansion of existing employment sites, both in and outside the built-up area, but with stricter criteria for development outside the built-up area.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for the historic environment.
11 - Transport	++	+	Both options have a positive impact on the sustainability objective for transport because they seek to support employment in the District. This increases the chance of people both living and working in the District, reducing the need to travel.
12 - Energy/Waste	?	?	Both options have an unknown impact upon the sustainability objective for energy/waste. It is difficult to identify future impacts without detailed information on the energy efficiency and waste management plans of future development.
13 - Water	?	?	Both options have an unknown impact upon the sustainability objective for energy/waste. In a similar way to the uncertainty of energy/waste, it is difficult to determine the effect of future development will be on the District's water resources.
14 - Regeneration	+	+	Both options have a positive impact on the sustainability objective for regeneration. While most identified existing employment sites are not in settlement centres, the employment opportunities and potential for economic growth supported by existing employment sites should have a generally positive knock-on effect upon the viability and vitality of the District's settlements and their shopping facilities.
15 - Employment	++	+	Both options have a positive impact on the sustainability objective for employment because they seek to support employment in the District. Option (a) goes further than Option (b) to protect existing employment sites, and provides a criteria-based policy framework that allows for appropriate expansion of existing employment sites, both in and outside the built-up area. This framework should support employment opportunities in Mid Sussex.
16 - Ec. Growth	++	+	Both options have a positive impact on the sustainability objective for economic growth because they seek to support economic growth in the District. Option (a) goes further than Option (b) to protect existing employment sites, and provides a criteria-based policy framework that allows for appropriate expansion of existing employment sites, both in and outside the built-up area. This framework should support economic growth in Mid Sussex.
Summary of Appraisal:			
<p>As there is a current District Plan policy in place to protect existing employment sites, both options are similar in their appraisal and have mostly positive impacts on the sustainability objectives. By having a new policy in the Site Allocations DPD (option (a)), which defines such areas on the proposals map and sets a criteria about what development is appropriate within, adjacent to or within the vicinity of these sites, a more robust policy framework is in place to protect and allow for appropriate expansion of these important sites.</p> <p>The more robust policy provided by option (a) explains the greater number of significantly positive scores in comparison to option (b), particular on environmental and economic sustainability objectives which have a more direct link to the proliferation of employment sites in the District. In terms of the social sustainability objectives, both options have a likely positive impact, though it is somewhat difficult to quantify the effect of each option on social objectives.</p>			
Cross-Border Impacts:			

There are no cross-border impacts likely to arise from this policy.	
Recommendations and Mitigation Measures:	
Option (a) should include sufficient mitigation for site expansion in the countryside.	
Preferred Option:	A

Safeguarding of Land for and Delivery of Strategic Highway Improvements

Reasonable Alternatives for Assessment

Option (a):
To have a policy that supplements District Plan Policy **DP 21: Transport** by providing an additional policy to safeguard land to support the delivery of transport schemes, identified in relation to the Site Allocations DPD, to ensure that proposed development is sustainable.

Option (b):
To not have this policy, and therefore rely on District Plan Policy **DP 21: Transport**.

Objective	A	B	Assessment
1 - Housing	++	+	Both options have a positive impact on the sustainability objective for housing. Highways improvements are vital to ensure the road network is capable of accommodating future development in the District. Option (a) is more positive because it provides policy support for particular transport schemes.
2 - Health	++	+	Both options have a positive impact on the sustainability objective for health. Though not necessarily effecting provision, highways improvements increase accessibility of health facilities. Option (a) is more positive because it provides policy support for particular transport schemes.
3 - Education	++	+	Both options have a positive impact on the sustainability objective for education. Though not necessarily effecting provision, highways improvements increase accessibility of education facilities. Option (a) is more positive because it provides policy support for particular transport schemes.
4 - Retail	++	+	Both options have a positive impact on the sustainability objective for retail. Though not necessarily effecting provision, highways improvements increase accessibility of education facilities. Option (a) is more positive because it provides policy support for particular transport schemes.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for crime.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	+	-	Option (a) has a positive impact on the sustainability objective for land use. The safeguarding of land aims to ensure the land will be used most appropriately. Option (b) has a negative impact because it provides no specific policy framework for the identified land and there is a risk that without a new policy, the land could be developed for other uses.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	0	0	Neither option has an identified impact upon the sustainability objective for the countryside.

10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for the historic environment.
11 - Transport	++	+	Both options have a positive impact on the sustainability objective for transport. Option (a) is more positive because it provides policy support for particular transport schemes.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	0	0	Neither option has an identified impact upon the sustainability objective for water.
14 - Regeneration	++	+	Both options have a positive impact on the sustainability objective for regeneration. Though not necessarily effecting provision, highways improvements increase accessibility of town centre facilities. Option (a) is more positive because it provides policy support for particular transport schemes.
15 - Employment	++	+	Both options have a positive impact on the sustainability objective for regeneration. An effective local road network, particularly in terms of connectivity to strategic highways, is an important contributor to business development and employment opportunity in the District. Option (a) is more positive because it provides policy support for particular transport schemes.
16 - Ec. Growth	++	+	Both options have a positive impact on the sustainability objective for regeneration. An effective local road network, particularly in terms of connectivity to strategic highways, is an important contributor to economic growth in the District. Option (a) is more positive because it provides policy support for particular transport schemes.

Summary of Appraisal:

As there is a current District Plan policy in place which provides transport-related requirements for development, both options are similar in their appraisal and have mostly positive impacts on the sustainability objectives. By having a new policy in the Site Allocations DPD (option **(a)**), which safeguards areas on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect these important sites.

The more robust policy provided by option **(a)** explains the greater number of significantly positive scores in comparison to option **(b)**, particularly on economic sustainability objectives which have a more natural benefit to be had from highways improvements. Both options also have a likely positive impact on social sustainability objectives, not because they increase provision but because they increase accessibility to local facilities. There are also positive impacts to be had by option **(a)** in relation to environmental sustainable objectives; option **(b)** has a negative impact on the land use objective because without the proposed new policy, the identified land is at risk of inappropriate development.

Cross-Border Impacts:

There are no cross-border impacts likely to arise from this policy.

Recommendations and Mitigation Measures:

None suggested.

Preferred Option:

A

Wivelsfield Railway Station

Reasonable Alternatives for Assessment

Option (a):

To have a policy which safeguards Land to the west of Wivelsfield Railway Station to support the delivery of a package of improvements at Wivelsfield Railway Station.

Option (b): To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.			
Objective	A	B	Assessment
1 - Housing	+	0	Option (a) has a positive impact on the sustainability objective for housing. Infrastructure improvements, particularly those that support strategic sustainable transport links, are important to ensure the District can accommodate planned development.
2 - Health	0	0	Neither option has an identified impact upon the sustainability objective for health.
3 - Education	0	0	Neither option has an identified impact upon the sustainability objective for education.
4 - Retail	0	0	Neither option has an identified impact upon the sustainability objective for retail.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for crime.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	+	-	Option (a) has a positive impact on the sustainability objective for land use. The safeguarding of land aims to ensure the land will be used most appropriately. Option (b) has a negative impact because it provides no specific policy framework for Wivelsfield Railway Station and there is a risk that without a new policy, the site could be developed for inappropriate uses.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	0	0	Neither option has an identified impact upon the sustainability objective for the countryside.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for the historic environment.
11 - Transport	++	-	Option (a) has a significantly positive impact on the sustainability objective for transport because it provides support for improvements at Wivelsfield Railway Station, encouraging users to use public transport. Option (b) has a negative impact because it provides no specific policy framework for development at Wivelsfield Station and would not ensure the safeguarded land is used to improve the station.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	0	0	Neither option has an identified impact upon the sustainability objective for water.
14 - Regeneration	++	0	Option (a) has a significantly positive impact on the sustainability objective for regeneration. Improvements to railway stations are important contributors to regeneration in Burgess Hill.
15 - Employment	++	0	Option (a) has a significantly positive impact on the sustainability objective for employment. Railway stations are important to those travelling in and out of Burgess Hill for employment.
16 - Ec. Growth	++	0	Option (a) has a significantly positive impact on the sustainability objective for economic growth. An effective local rail network, particularly in terms of connectivity to employment sites, is an important contributor to economic growth in the District.
Summary of Appraisal:			
There is nothing in the current Development Plan which provides a specific policy for Wivelsfield Railway Station. Without the proposed new policy, there is unlikely to be severe negative impacts across the board, but there are a few notable negative impacts should the Development Plan			

<p>proceed without a new policy (option (b)). Particularly in terms of land use and transport objectives, there is a risk that without a new policy, the site could be developed for inappropriate uses.</p> <p>By having a new policy in the Site Allocations DPD (option (a)), which safeguards land at Wivelsfield Railway Station on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect this important site.</p> <p>The robust policy provided by option (a) explains the greater number of positive impacts in comparison to option (b), particularly on economic sustainability objectives where there are likely to be positive impacts to be gained from improvements to strategic sustainable transport links. This too has a positive impact on the transport sustainability objective.</p>	
Cross-Border Impacts:	
There are no cross-border impacts likely to arise from this policy.	
Recommendations and Mitigation Measures:	
None suggested.	
Preferred Option:	A

Burgess Hill / Haywards Heath Multifunctional Network			
Reasonable Alternatives for Assessment			
<p>Option (a): To have a policy for the Burgess Hill/ Haywards Heath Multifunctional Network which supports the delivery of a programme of sustainable transport infrastructure improvements to support development, particularly strategic development at Burgess Hill.</p> <p>Option (b): To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.</p>			
Objective	A	B	Assessment
1 - Housing	+	0	Option (a) has a positive impact on the sustainability objective for housing. Infrastructure improvements, particularly those that support sustainable transport, are important to ensure the District can accommodate future development.
2 - Health	+	0	Option (a) has a positive impact on the sustainability objective for health. Though not necessarily effecting provision, sustainable transport improvements increase accessibility of health facilities.
3 - Education	+	0	Option (a) has a positive impact on the sustainability objective for education. Though not necessarily effecting provision, sustainable transport improvements increase accessibility of education facilities.
4 - Retail	+	0	Option (a) has a positive impact on the sustainability objective for retail. Though not necessarily effecting provision, sustainable transport improvements increase accessibility of retail facilities.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for crime.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	+	-	Option (a) has a positive impact on the sustainability objective for land use. The safeguarding of land aims to ensure the land will be used most appropriately. Option (b) has a negative impact because it provides no specific policy framework for the Burgess Hill/ Haywards Heath Multifunctional Network and would not ensure the land is put to best use.

8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	-	0	Option (a) allocates land in the countryside for development so has a negative impact on the sustainability objective for the countryside. The impact is low because development is likely to constitute a foot/cycle/bridle path that could also improve access and enjoyment of the countryside.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for crime.
11 - Transport	++	-	Option (a) has a positive impact on the sustainability objective for transport because it provides support for a Burgess Hill/ Haywards Heath Multifunctional Network. Option (b) has a negative impact because it provides no specific policy framework for the Burgess Hill/ Haywards Heath Multifunctional Network.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	0	0	Neither option has an identified impact upon the sustainability objective for water.
14 - Regeneration	++	0	Option (a) has a significantly positive impact on the sustainability objective for regeneration. Though not necessarily effecting provision, sustainable transport improvements increase accessibility of town centre facilities.
15 - Employment	+	0	Option (a) has a positive impact on the sustainability objective for employment because it could improve the ability of people to move sustainably between Burgess Hill and Haywards Heath for work.
16 - Ec. Growth	0	0	Neither option has an identified impact upon the sustainability objective for economic growth.
Summary of Appraisal:			
<p>There is nothing in the current Development Plan which provides a specific policy for Burgess Hill/ Haywards Heath Multifunctional Network. Without the proposed new policy, there is unlikely to be severe negative impacts across the board, but there are a few notable negative impacts should the Development Plan proceed without a new policy (option (b)). There is a risk that without a new policy, the identified areas could be developed for alternative uses.</p> <p>By having a new policy in the Site Allocations DPD (option (a)), which provides policy on the proposals map and aims to restrict harmful development, a more robust policy framework is in place to protect this important site.</p> <p>Option (a) has multiple positive sustainability impacts; the introduction of a multifunctional network between Haywards Heath and Burgess Hill could bring social, environmental and economic benefits. However, this option could negatively impact upon the sustainable objective for the countryside, as it could bring potentially harmful development to what is currently, mostly open countryside. Nonetheless, the impact should be low because development is likely to constitute little more than a foot/cycle/bridle path that is also likely to improve access to and enjoyment of the countryside.</p>			
Cross-Border Impacts:			
There are no cross-border impacts likely to arise from this policy.			
Recommendations and Mitigation Measures:			
None suggested.			
Preferred Option:	A		

Air Quality			
Reasonable Alternatives for Assessment			
<p>Option (a): To have a policy that supplements District Plan Policy DP29: Noise, Air and Light Pollution by providing additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs. It also addresses potential air quality impacts for the Ashdown Forest SPA and SAC.</p> <p>Option (b): To not have this policy, and therefore rely on District Plan Policy DP29: Noise, Air and Light Pollution.</p>			
Objective	A	B	Assessment
1 - Housing	0	0	Neither option has an identified impact upon the sustainability objective for land use.
2 - Health	++	+	Both options (a) and (b) have a positive impact on the sustainability objective for health. Both seek to improve overall air quality in the District. This is positive because air quality is linked to human health. Because of the more robust policy framework provided, Option (a) achieves this aim to a greater extent than option (b).
3 - Education	0	0	Neither option has an identified impact upon the sustainability objective for education.
4 - Retail	0	0	Neither option has an identified impact upon the sustainability objective for retail.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for communities.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	0	0	Neither option has an identified impact upon the sustainability objective for land use.
8 - Biodiversity	++	+	Both options (a) and (b) have a positive impact on the sustainability objective for biodiversity because improving air quality supports biodiversity. This is particularly important in relation to Air Quality at Ashdown Forest SAC (in adjacent Wealden District). Option (a) provides a more robust policy framework to support this objective.
9 - Countryside	++	+	Both options (a) and (b) have a positive impact on the sustainability objective for biodiversity because improving air quality supports the countryside. Option (a) provides a more robust policy framework to support this objective.
10 - Historic	++	+	Both options (a) and (b) have a positive impact on the sustainability objective for the historic environment because poor air quality can harm building materials. Option (a) provides a more robust policy framework to support this objective.
11 - Transport	++	+	Both options (a) and (b) have a positive impact on the sustainability objective for transport because it aims to reduce air pollution from traffic and mitigate against harmful impacts. Option (a) provides a more robust policy framework to support this objective.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	?	?	There may indirect benefits to watercourses by improving air quality in the District.
14 - Regeneration	0	0	Neither option has an identified impact upon the sustainability

			objective for regeneration.
15 - Employment	0	0	Neither option has an identified impact upon the sustainability objective for employment.
16 - Ec. Growth	0	0	Neither option has an identified impact upon the sustainability objective for economic growth.
Summary of Appraisal:			
<p>In protecting residents' quality of life from unacceptable levels air pollution, option (a) and (b) have many positive impacts on the social and environmental sustainability objectives, though have no identified impact on the economic objectives.</p> <p>There are no identified negative impacts should the Development Plan proceed without a new policy about air quality, however, there a more significantly positive impacts to be had should a new policy be introduced through the Site Allocations DPD.</p> <p>By providing additional policy requirements for when an air quality assessment may be required, for example, in relation to an AQMAs, and addressing potential air quality impacts for the Ashdown Forest SAC (where air quality is a factor), option (a) provides a more robust policy framework than option (b) to ensure that any negative impact of new development on air quality is minimised and appropriately mitigated when necessary.</p>			
Cross-Border Impacts:			
The positive impacts to air quality will have a positive cross-boundary, particularly the Ashdown Forest.			
Recommendations and Mitigation Measures:			
None suggested			
Preferred Option:	A		

9. Appraisal Conclusions

10.1. The following table shows the combined impacts of the Housing allocations (red highlight), Employment allocations (purple highlight) and Science and Technology Park (yellow highlight) in order to assess the impacts of the allocations as a whole against the sustainability objectives.

Site Allocations – Preferred Options	Sustainability Objectives															
	Social					Environmental							Economic			
	1 - Housing	2 - Health	3 - Education	4 - Retail	5 - Communities	6 - Flood Risk	7 - Land Use	8 - Biodiversity	9 - Countryside	10 - Historic	11 - Transport	12 - Energy/Waste	13 - Water	14 - Regeneration	15 - Employment	16 - Ec. Growth
Ansty Cross Garage, Cuckfield Road. SHELAA#644	+	-	-	++	+	0	+	0	-	0	?	?	?	++	+	+
Land west of Selsfield Road. SHELAA#832	++	-	++	++	+	0	-	0	-	-	?	?	?	++	+	+
Land south of Hammerwood Road. SHELAA#138	+	-	++	++	+	0	-	-	-	0	?	?	?	++	+	+
Land at Dirty Lane/Hammerwood Road. SHELAA#207	+	-	++	++	+	0	-	-	--	0	?	?	?	++	+	+
St. Wilfrids Catholic Primary School, School Close. SHELAA#345	+	++	+	++	+	0	++	0	0	0	?	?	?	++	+	+
Land South of Southway. SHELAA#594	+	+	++	++	+	0	-	0	0	0	?	?	?	++	+	+
Woodfield House, Isaacs Lane. SHELAA#840	+	?	?	?	+	0	-	0	-	0	?	?	?	-	+	+
Land to the south of Selby Close, Hammonds Ridge. SHELAA#904	+	-	-	++	+	0	-	0	0	0	?	?	?	++	+	+
Land north of Burleigh Lane. SHELAA#519	++	++	++	++	+	0	-	0	-	0	?	?	?	++	+	+
Land at Haniye Lane to the east of Ardingly Road. SHELAA#479	+	++	++	++	+	0	-	-	-	0	?	?	?	++	+	+
Land south of Crawley Down Road, Felbridge. SHELAA#196	+	-	++	++	+	-	--	-	-	0	?	?	?	++	+	+
Land south and west of Imberhome Upper School, Imberhome Lane. SHELAA#770	++	-	++	+	+	0	--	-	0	-	?	?	?	+	+	+
East Grinstead Police Station, College Lane. SHELAA#847	+	+	++	+	+	0	++	0	-	0	?	?	?	+	+	+
Land at St. Martin Close.	++	0	0	+	+	0	-	0	--	0	?	?	?	+	+	+

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Site Allocations – Preferred Options	Sustainability Objectives															
	Social					Environmental							Economic			
	1 - Housing	2 - Health	3 - Education	4 - Retail	5 - Communities	6 - Flood Risk	7 - Land Use	8 - Biodiversity	9 - Countryside	10 - Historic	11 - Transport	12 - Energy/Waste	13 - Water	14 - Regeneration	15 - Employment	16 - Ec. Growth
SHELAA#127																
Land to the north of Shepherds Walk. SHELAA#221	++	0	+	+	+	-	-	0	-	0	?	?	?	++	+	+
Rogers Farm, Fox Hill, Haywards Heath. SHELAA#783	+	0	-	+	+	0	-	0	-	-	?	?	?	++	+	+
Land south of St. Stephens Church, Hamsland. SHELAA#184	++	-	++	++	+	0	-	0	-	0	?	?	?	++	+	+
Land at Police House Field, Birch Grove Road/Danehill Lane. SHELAA#216	++	-	++	++	+	0	-	0	--	?	?	?	?	++	+	+
Land South of The Old Police House, Birchgrove Road, Horsted Keynes. SHELAA#807	++	-	++	++	+	0	-	0	--	?	?	?	?	++	+	+
Land to the north Lyndon, Reeds Lane. SHELAA#829	++	-	-	++	+	0	-	0	-	0	?	?	?	++	+	+
Withypitts Farm, Selsfield Road. SHELAA#854	++	-	++	++	+	0	-	-	-	0	?	?	?	++	+	+
Bolney Grange (4 sites)	0	0	0	0	+	0	?	?	-	0	?	?	?	+	+	++
Pease Pottage Nurseries	0	0	0	0	0	0	-	-	--	0	?	?	?	+	+	+
Burnside Centre, BH	+	+	0	+	+	0	++	0	0	0	?	?	?	++	++	+
Marylands Nursery, Bolney	0	0	0	0	0	0	++	0	-	0	?	?	?	+	+	+
Cedars, Pease Pottage	0	0	0	0	0	0	++	0	-	0	?	?	?	++	+	+
Former KDG, Burgess Hill	+	+	0	+	+	0	++	0	0	0	?	?	?	++	++	+
A264 J10, Copthorne	0	0	0	0	0	0	-	0	-	0	?	?	?	++	++	++

Site Allocations – Preferred Options	Sustainability Objectives															
	Social					Environmental							Economic			
	1 - Housing	2 - Health	3 - Education	4 - Retail	5 - Communities	6 - Flood Risk	7 - Land Use	8 - Biodiversity	9 - Countryside	10 - Historic	11 - Transport	12 - Energy/Waste	13 - Water	14 - Regeneration	15 - Employment	16 - Ec. Growth
Science and Technology Park – A2300 North #949	0	0	+	+	+	-	-	-	-	0	?	+	?	++	++	++

Table 21 - Summary of Appraisals

10.2. The assessment shows that the majority of the site options chosen impact positively on the social and economic objectives. Where a negative sustainability impact has been identified, it is to be mitigated against through site specific policies, or in some cases, is indicative of an inevitable conflict between allocating land for housing and protecting the environment (as described in section 5).

In-Combination Effects: Conclusions

1 – Housing

All proposed site allocations make a positive contribution towards the residual housing need, and have demonstrated deliverability. This supports the sustainability objective to ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford.

2 – Health

A number of proposed site allocations have a negative impact on the sustainability objective to improve the access to health, leisure and open space facilities and reduce inequalities in health. This is because the sites are located more than a 20 minute walk to the nearest GP surgery. This is in some cases inevitable for sites which are to be allocated in settlements within Category 3 and Category 4 of the Settlement Hierarchy, where there are fewer facilities.

To mitigate this negative impact, all site allocations will be required to support the provision of healthcare infrastructure in Mid Sussex. This might be through direct provision of a facility, provision of land, or through a financial contribution. An indicative requirement for each site is included in the IDP that accompanies the Site Allocations DPD.

3 - Education

A few site allocations have a negative impact on the sustainability objective to maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities. This is because the sites are located more than a 20 minute walk to the nearest primary school. This is in some cases inevitable for sites which are to be allocated in settlements within Category 3 and Category 4 of the Settlement Hierarchy, where there are fewer facilities.

To mitigate this negative impact, all site allocations will be required to support the provision of education infrastructure in Mid Sussex. This might be through direct provision of a facility, provision of land, or through a financial contribution. An indicative requirement for each site is included in the IDP that accompanies the Site Allocations DPD.

4 - Retail

All site allocations make a positive contribution towards the sustainability objective to improve access to retail and community facilities; all sites are within a 15 minute walk of the nearest convenience store.

5 – Communities

All site options would encourage the growth of communities and are therefore likely to have a positive impact on this objective.

6 - Flood Risk

There are two site allocations which have a negative impact on the sustainability objective to ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere. As mitigation, both of these sites should have site specific policies that either prohibit development within the area of flood risk, or require mitigation against the risk.

7 - Land Use

Most site allocations have a negative impact on the sustainability objective to improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance. This is because these are predominantly green field site allocations. The larger site allocations have the most significantly negative impact. This is an inevitable conflict between housebuilding and protection of the countryside, as explained in section 5.

Nonetheless, there are a few brownfield sites and these have a positive impact on this objective.

8 - Biodiversity

There are a number of site allocations that have a negative impact on the sustainability objective to conserve and enhance the District's biodiversity, though none have a significant impact.

All sites should have a generic policy requirement to conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity, and to avoid, mitigate and compensate for any loss to biodiversity through ecological protection, enhancement and mitigation measures. In some cases, site allocations should identify measures to mitigate impact on specific biodiversity designations.

9 - Countryside

Most site allocations have a negative impact on the sustainability objective to protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. This is because they are outside a settlement built up area boundary, and within the open countryside in policy (DP12) terms. There are some sites which do not have a negative impact upon the countryside because they are within a settlement built up area boundary.

Sites in the High Weald AONB should be subject to site specific policies to ensure the impact is mitigated and that development is sympathetic of the landscape. There should also be a requirement to undertake a Landscape and Visual Impact Assessment to inform site master planning. Some site allocations have a more significant negative impact than others because they are set within a particular sensitive area of the countryside; these sites should be subject to the most comprehensive site specific policy requirements to ensure the impact on the landscape is mitigated.

10 – Historic

A few site allocations have a negative impact on the sustainability objective to protect, enhance and make accessible for enjoyment, the District's historic environment. It has been considered that these sites can mitigate the impact based on the information provided by the site promoter and conclusions reached by the Council's Conservation Officer and other advisors. Detailed site specific policies should be included to ensure any harm upon an affected heritage asset is minimal.

11 - Transport

None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD. Access arrangements for the Science and Technology Park, and further testing of highways capacity will be required and further work has been identified to test this prior to submission.

12 - Energy/Waste

All site allocations have an uncertain impact on the sustainability objective to increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal.

Undoubtedly, the increase in number of homes resulting from the site allocations is likely to cause a net increase in energy consumption and waste production by the District as a whole. However, it is difficult to determine what the effects will be in regards to 'per household' indicators, without detailed information on the energy efficiency and waste management plans of future developments.

13 – Water

All site allocations have an uncertain impact on the sustainability objective to maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.

In a similar way to the uncertainty surround energy/waste, it is difficult to determine the precise effect of the site allocations will be on the District's water resources.

14 - Regeneration

Only one site has a negative impact on the sustainability objective to encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres. Woodfield House, Isaacs Lane has this impact because it is currently isolated in the countryside, some way away from Burgess Hill town centre. Nonetheless, this is expected to change, as it is located adjacent to the proposed Northern Arc strategic development which will provide Neighbourhood Centre facilities in time

15 – Employment

All site allocations have a positive impact on the sustainability objective to ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.

16 - Economic Growth

All site allocations have a positive impact on the sustainability objective to sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.

- 10.3. Overall, positive impacts are expected to arise for the sustainability objectives related to housing and employment. This is because the Site Allocations DPD is proposing to meet the residual need for both of these in full, with a sufficient buffer to improve the robustness of supply. Therefore, these objectives should be met by the collection of sites chosen for allocation.
- 10.4. The sites chosen in themselves represent the most sustainable reasonable alternatives. Arriving at the preferred sites has involved a thorough site selection process to remove sites that are not compliant with the District Plan strategy (which itself was appraised in the

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Sustainability Appraisal accompanying the plan), assessment against a number of criteria, and finally an assessment against the sustainability framework. This has ensured that the sites selected are the best sites in deliverability and sustainability terms. This process relates to both housing and employment sites, as well as the Science and Technology Park. Further information on the full process is reported in Site Selection Paper 3: Housing and Site Selection Paper 4: Employment.

10. Next Steps

Task A5 – Consulting on the Scope of the Sustainability Appraisal / Strategic Environmental Assessment

10.1. This Sustainability Appraisal report will be consulted on alongside the Regulation 19 Site Allocations DPD. Consultation on the Sustainability Appraisal will follow the same guidelines and requirements for consultation as the DPD itself, as per the District Council's Statement of Community Involvement (SCI). This will involve a formal consultation period of a minimum of 6 weeks where District, Town and Parish Councillors, statutory consultees and the general public are able to comment on the Site Allocations DPD and the content and findings of its accompanying Sustainability Appraisal.

D2 – Assessment of Significant Changes

10.2. Undertaking Sustainability Appraisal is an iterative process. The results of the consultation will be submitted to the Secretary of State.

10.3. Any significant changes that result from this consultation will be reported through the examination process. These changes may result in the need to re-appraise some of the policy areas in this report, similarly new options or policy areas may arise that will require appraisal for the first time ahead of adoption.

D3 – Decision Making and Providing Information

10.4. The information within this report has been taken into account when preparing the draft Site Allocations DPD for consultation, and will continue to do so for all future formal stages prior to its adoption.

10.5. The District Council will prepare an adoption statement, in compliance with the Environmental Assessment of Plans or Programmes Regulations 2004, to detail how the environmental (as well as social and economic elements) considerations have been taken into account in the preparation of the Site Allocations DPD.

Appendix 1 – Review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the Site Allocations DPD.

Introduction

As required by Article 5(1) Annex 1 (a) and (e) of the Strategic Environmental Assessment Directive this Appendix sets out the plans, programmes, policies, strategies, guidance and initiatives, which have informed the content of the Site Allocations DPD.

The Appendix is set out in six tables, one detailing plans, programmes, policies, strategies, guidance and initiatives that cover General Sustainable Development principles, and then one table for each of the five guiding sustainable development principles:

- Ensuring a Strong, Healthy and Just Society
- Living Within Environmental Limits
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly

There are a number of PPPSGIs that cover one or more of the five headings; these have been placed in the general category where it is clear that they can impact on all of the five areas. For those that could impact on one or two areas a decision has been made to include them in only one category.

Any conflicts, constraints and challenges, which may arise through the interpretation of the different policy documents, have been identified at the bottom of each table with an indication of how the Site Allocations DPD will take them into account.

General Sustainable Development

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
International		
The Johannesburg Declaration on Sustainable Development	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	Interpreted into national sustainable development strategies, which will inform the Site Allocations DPD.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
European Spatial Development Perspective	Sustainable development of the European Union, balancing competitiveness with economic and social cohesion, conservation and management of natural resources and the cultural heritage.	Interpreted into national guidance, which will inform the Site Allocations DPD.
National		
A Practical Guide to the Strategic Environmental Assessment Directive	Provides information and guidance on how to comply with the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.	The Sustainability Appraisal must fully integrate the SEA requirements.
Planning and Compulsory Purchase Act 2004	Clause 38 places a duty on Local Authorities to contribute to the achievement of sustainable development.	Mid Sussex District Council is required to produce a Sustainability Appraisal to accompany certain planning documents including the Site Allocations DPD.
Town and Country Planning Act 1990	Sets out the procedures for the preparation, approval and adoption of Development Plans and for the control of development.	Certain parts of the Act need to be adhered to in preparing the Site Allocations DPD.
National Planning Policy Framework (NPPF) - 2019	Sets out the Government’s priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Site Allocations DPD must be in conformity with the NPPF.
Planning Practice Guidance (NPPG)	Provides further guidance to support the NPPF	The Site Allocations DPD must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15 th November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
Local		
Mid Sussex District Council Corporate Plan	The main purpose of the Corporate Plan is to set out the Council’s priorities. These include Council self-sufficiency, sustainable economic growth and strong and resilient communities.	The District Plan reflects the issues highlighted by the Corporate Plan, the Site Allocations DPD will most likely benefit the economic growth priority.

Constraints, conflicts and challenges

Sustainable development has been placed at the centre of the new planning system. Legislation and guidance for planning and many other elements of sustainable development has been emerging for many years. It is essential that this is reflected in all Local Development Documents. The challenge is to ensure that it is easily understandable and that it is clear that economic, environmental and social considerations have been taken into account.

From the plans, programmes, policies, strategies, guidance and initiatives identified in the above table it is obvious that there is a significant amount of documentation advocating general sustainable development principles. The documents that should be given priority are the ones that are a material consideration in producing the Site Allocations DPD, as well as being the most recently published.

Ensuring a Strong, Healthy and Just Society

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
National		
National Planning Policy Framework (NPPF) - 2019	Sets out the Government’s priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Site Allocations DPD must be in conformity with the NPPF.
Planning Practice Guidance (NPPG)	Provides further guidance to support the NPPF	The Site Allocations DPD must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15 th November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
Local		
Mid Sussex District Council Development Infrastructure and Contributions SPD (2018)	Sets out various infrastructure requirements that development will be expected to contribute towards. Includes a contributions calculator for different sizes of new private and affordable dwellings.	The District Plan contains a broad policy on the infrastructure requirements of new developments, the Site Allocations DPD will set out infrastructure requirements on a site-by-site basis.
Burgess Hill Town Wide Strategy	This strategy sets out the general principles, visions	Policies relating to strategic development at

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
(2011)	and objectives for Burgess Hill over the plan period and provides a foundation on which policies addressing strategic development at Burgess Hill are based.	Burgess Hill will be informed by the Burgess Hill Town Wide Strategy.
Mid Sussex Rural Affordable Housing Strategy (2007)	The document sets out the Council's strategy for ensuring we are able to meet the housing needs of local residents in rural areas, in particular those who cannot afford to rent or buy a property on the open market.	Allocated sites will be required to deliver the District Plan affordable housing requirement.
Mid Sussex Community Safety Plan (2008)	To protect and improve the quality of the local environment and to achieve long-term reductions in crime, disorder and the fear of crime.	Allocated sites should accord with guidance produced by others, e.g. 'Safer Places' and 'By Design'.
Refreshed Housing Strategy for Mid Sussex (2012)	The key aim is to set out how a supply of good quality homes will be provided across the District. This provision also includes affordable housing.	The District Plan assists in meeting the aims of the strategy by providing affordable and open market housing, the DPD will accord with this.
Leisure & Cultural Strategy for Mid Sussex 2009-2020	The Strategy aims to guide all those involved in leisure and cultural provision as to how they can best work together to maximise the opportunities that can result from leisure and cultural development in Mid Sussex.	The Site Allocations DPD will need to take account of this strategy.

Constraints, conflicts and challenges

There is a general consensus in these documents that housing development has to occur within Mid Sussex and that new housing can enable some social problems to be alleviated. The challenge is to ensure that the Site Allocations balances the requirement for new development with its impact on the environment. It is also essential that the provision of new housing is linked with the provision of community facilities and services both within the new development and the existing town and village centres. Failure to do this would be likely to result in social exclusion.

Much of the policy and guidance that is laid out in the nationally produced documents has been translated into regional and district level policy and guidance, therefore resulting in few conflicts between the range of documents that cover social issues.

Living within Environmental Limits

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
International		
Kyoto Protocol 1997	The protocol commits 38 industrialised countries to cut their emissions of greenhouse gases between 2008 and 2012 to levels that are 5.2% below 1990 levels.	Interpreted into national guidance.
European Union Sixth Environmental Action Plan	High level of protection of the environment and human health and a general improvement in the environment and quality of life.	Interpreted into national guidance.
European Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment	Sets out detailed requirements of environmental assessment required for plans such as Development Plan Documents.	The sustainability appraisal accompanying the Site Allocations DPD must comply with the requirements of this legislation.
European Directive 92/43/EEC (and amended by 97/62/EC) on the conservation of natural habitats and of wild flora and fauna (known as the Habitats Directive)	To conserve natural habitats and threatened species. To protect natural heritage.	The sustainability appraisal accompanying the Site Allocations DPD must comply with the requirements of this legislation.
European Directive 79/409/EEC (and amended by 2009/147/EC) on the conservation of wild birds (known as the Birds Directive)	Preservation, maintenance or restoration of sufficient diversity and area of habitats in order to conserve all species of birds.	This Directive has been interpreted into national guidance
National		
Wildlife and Countryside Act 1981 (as amended)	Serves to protect the most important examples of habitats and species in Britain.	This Act has been interpreted into national guidance.
Countryside and Rights of Way Act 2000 (the CROW Act)	Tightens the provisions of the above mentioned Act by making it an offence to recklessly damage protected habitats and fauna.	This Act has been interpreted into national guidance. Regard needs to be given to this guidance in the Site Allocations DPD.
Conservation of Habitats and Species Regulations 2017	Implements the Habitats Directive and protects biodiversity through the conservation of natural habitats and species of wild fauna and flora.	The Site Allocations DPD must comply with the requirements of this legislation.
Waste Strategy for England (Defra, 2007)	The strategy describes the Government’s vision for sustainable waste management. This includes seeking to increase the percentages of waste that is either	The Site Allocations DPD should reflect the vision of this document.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
	recycled or composted over a given period of time.	
Catchment Abstraction Management Strategies	These strategies set out the Environment Agency policies for the licensing of water abstraction.	The Management Strategies that are applicable to Mid Sussex District will need to be taken into consideration when deciding how new housing development will be served with water.
The Water Framework Directive and the production of River Basin Management Plans.	The Directive seeks to promote the sustainable use of water, protecting and restoring aquatic ecosystems and to contribute towards the mitigation of the effects of flood and droughts.	The Site Allocations DPD should promote sustainable water management and improvements in water quality of 'water bodies'.
Energy White Paper: Our Energy Future: Creating a Low Carbon Economy (DTI, 2003)	This strategy defines a long-term strategic vision for energy policy combining the governments environmental, security of supply, competitiveness and social goals.	To assist in implementing the government's goals for the energy policy (i.e. cut carbon dioxide emissions and maintain the reliability of energy supplies).
National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Site Allocations DPD must be in conformity with the NPPF.
Defra 25 Year Environment Plan	Sets out the Government's actions to help the natural world regain and retain good health.	The Site Allocations DPD will consider the wider environmental actions within this plan.
Regional/ County		
Biodiversity Action Plan for Sussex	Purpose to focus resources to conserve and enhance biodiversity in Sussex by means of local partnerships, taking account of national and local priorities.	The Site Allocations DPD will need to take account of nature conservation and biodiversity issues.
West Sussex Transport Plan 2011-2026	Key objectives of the plan include providing a high quality and resilient transport network, and improve accessibility to services, quality of life, safety, public transport and sustainability.	Proposed schemes and measures are put forward for Mid Sussex and the Site Allocations DPD will need to take these into account.
The High Weald AONB Management Plan 2019-2024	Identifies the important features of the AONB and sets out guidance and objectives on the ways in which these features can be protected, restored and enhanced.	The land and countryside management issues in the document should be considered in the Site Allocations DPD.
A Strategy for the West Sussex Landscape, West Sussex County Council (2005)	The document identifies the important features of the character of the West Sussex landscape and sets out a number of key management issues and guidelines. It	The land and countryside management issues in the document will need to be considered for the Site Allocations DPD.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
	does not contain land use policies but deals with good management practice of the area in relation to landscape character.	
High Weald Natural Area profile, published by English Nature	The Natural Area profile contains an analysis of the local wildlife resource and provides a context within which the Biodiversity Action Plan for Sussex can operate. It sets strategic objectives for conservation of those features characteristic of the Natural Area.	The Site Allocations DPD will need to take account of nature conservation and biodiversity issues. The Site Allocations DPD should draw on strategic objectives described in the Natural Area profile.
Seeing the Wood for the Trees: A Forestry and Woodlands Framework for South East England (2004)	Sets out a framework for the future development of woodlands and forestry in the South East with the vision of wanting woods to make an increasing contribution to the sustainable development of the South East region in both rural and urban areas.	The Site Allocations DPD will need to take into account areas of woodland.
Countryside Character Volume 7: South East and London, CA 13 (1999)	Identifies the important features of the character of England, including the High Weald Character Area 122 and sets out a number of key management issues and guidelines. It does not contain land use policies but deals with good management practice of the area in relation to landscape character.	The land and countryside management issues in the document should be considered in relation to the proposed development options.
Mid Sussex Landscape Character Assessment (2005)	This document looks in more detail at the character of the District and contains detailed management guidelines.	The management guidelines in particular have been taken into consideration when looking at the locations for new development.
Mid Sussex Ancient Woodland Survey (2007)	The survey sought to identify the areas of ancient woodland within Mid Sussex.	Ancient Woodland is a key biodiversity asset for the district and needs to be recognised in the Site Allocations DPD.
South East River Basin Management Plan (2015)	Provides the details regarding the status of waterbodies in Mid Sussex District and sets the requirements for their improvement and achieving good ecological status by 2027.	The Site Allocations DPD will need to take into the impact on waterbodies.
Local		
Mid Sussex Historic Landscape Characterisation (2006)	This work looks in more detail at the history of the landscape of the District.	The management guidelines have been taken into consideration when looking at the

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
Mid Sussex Extensive Urban Surveys (2005 and 2006)	These surveys are a joint venture between West and East Sussex County Councils, Brighton & Hove City Council and English Heritage and cover 41 historic towns/ villages, 5 of which are within Mid Sussex. The output is a Historic Character Assessment Report, which aid in the understanding of the historic qualities of the towns and villages in Mid Sussex.	locations for new development. The reports aid in the assessment of the options for the strategic locations of housing as well as identifying key historical features of value that have been considered in the allocations within the Site Allocations DPD.
Mid Sussex Strategic Flood Risk Assessment (2015)	Produced in accordance with SFRA guidance, this work identifies all areas of flood risk within the district as well as what the level of risk is. Guidelines for new development, with regards to avoiding areas of flood risk, requirements of a flood risk assessment and advice on the use of SuDS have subsequently been prepared.	The Site Allocations DPD needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Mid Sussex is not exacerbated and, where possible, reduced. The Strategic Flood Risk Assessment is a key tool for achieving these requirements.
Conservation Area Appraisals and Management Guidelines	The Appraisal and Management Guidelines are produced in order to clearly identify what qualities make the specific conservation areas special and how these qualities can be preserved and enhanced.	These documents provide further information on the areas of townscape that are important to Mid Sussex, which the Site Allocations DPD could use in setting the policy approach for sites impacting on these areas.
Catchment Flood Management Plans for the Adur, Ouse, Medway and Thames	These documents are strategic planning tools through which the Environment Agency will seek to work with other key decision-makers within a river catchment to identify and agree policies for sustainable flood risk management.	The Site Allocations DPD will need to complement these CFMPs and ensure that it does not compromise the ability of the CFMP to deliver its policies.
Mid Sussex Capacity Study (LUC) (2014)	The study identifies the capacity of the Mid Sussex landscape to accommodate strategic development.	This study has been a key piece of evidence in the identification and appraisal of options for the strategic locations of housing as well as the formulation of policies concerning the District's landscape.
Mid Sussex District Council Sustainable Construction SPD (2006)	Seeks to promote sustainable building methods based on national advice and good practice on sustainable construction. Acknowledges that each site should be	The Site Allocations DPD should take into account sustainable construction techniques.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
	considered on its individual merits in terms of which sustainable construction techniques are appropriate.	

Constraints, conflicts and challenges

Concerning conflicts between the environmental plans and policies, there does not seem to be any obvious cases. This is generally due to International and European environmental legislation being incorporated into national and regional planning guidance.

There is a general consensus that the built and natural environment is an important resource that should be safeguarded. However, the need for new housing in West Sussex that cannot be accommodated on brownfield sites means that some loss is inevitable.

A balance needs to be struck between the acknowledged need for new development and the importance attached to natural areas. Therefore, the Site Allocations DPD will need to incorporate measures to minimise and mitigate the impact of the proposed development on the environment.

Achieving a Sustainable Economy

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
National		
Good Practice Guide on Planning for Tourism (2006)	This document sets out guidance on the importance of tourism and to facilitate, promote and deliver new tourism development in a sustainable way.	The Site Allocations DPD needs to consider the guidelines in this document.
National Planning Policy Framework (NPPF) - 2019	Sets out the Government’s priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Site Allocations DPD must be in conformity with the NPPF.
Planning Practice Guidance (NPPG)	Provides further guidance to support the NPPF	The Site Allocations DPD must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.

	Royal Assent on 15 th November 2011.	
Local		
Mid Sussex Economic Development Strategy and Action Plan (2013)	The document lists 4 specific objectives for economic development in the District and states how the Council will assist in meeting these aims. The document highlights how the Council will assist in achieving the aims of the plan, including through the planning system.	The document highlights how the Council will assist in achieving the aims of the plan, including through the planning system.
Mid Sussex Employment Land Review (2009 and 2010)	This document provides an up to date assessment of the supply of and demand for employment land and floorspace in Mid Sussex.	This is an important part of the evidence base for the setting of the vision, objectives and policy on economic development.
Mid Sussex Retail Study (2014)	The key objectives of this study are: <ul style="list-style-type: none"> • To establish the vitality and viability of the retail centres in the District; and • To provide a robust assessment of current and projected retail needs for the period to 2026. 	This is an important part of the evidence base for the setting of the vision, objectives and policy on retail development.

Constraints, conflicts and challenges

There are no obvious constraints or conflicts between the economic and employment related plans or policies. However, at a national level there is a strong desire to utilise previously developed land first for new employment facilities. This is also the case for new housing development and therefore there could be a conflict between developing previously developed sites for housing or employment, especially given that there is only a limited amount of previously developed land within the District.

Similar to the need for new housing, the need the new employment facilities will have to balance the need to protect the environment of the District.

Promoting Good Governance

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
National		
Planning and Compulsory Purchase Act 2004	Requires all local planning authorities to prepare a Statement of Community Involvement (SCI). This sets out how the local community and stakeholders can get involved in the planning process with particular attention	The Local Planning Authority is required to produce a Statement of Community Involvement to accompany certain planning documents.

	given to community involvement in the preparation of Local Development Documents (LDD).	
National Planning Policy Framework (NPPF) - 2019	Sets out the Government’s priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Site Allocations DPD must be in conformity with the NPPF.
Planning Practice Guidance (NPPG)	Provides further guidance to support the NPPF	The Site Allocations DPD must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15 th November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
Local		
Mid Sussex District Council – Statement of Community Involvement (2019)	Sets out how the Council will engage with the public in the preparation and adoption of Development Plan Documents. To reflect the varying nature of the Development Plan Documents, different techniques are being used for each document to ensure that the appropriate engagement occurs.	The production of the Site Allocations DPD has and will need to have regard to the community engagement methods for Development Plan Documents contained within this document.

Constraints, conflicts and challenges

There are no constraints or conflicts between the good governance plans or policies.

Using Sound Science Responsibly

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the Site Allocations DPD
International		
Rio Declaration on Environment and Development – Principle 15: Precautionary Principle (1992)	In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall	The Site Allocations DPD will have regard to the precautionary principle to ensure irreversible environmental damage is avoided in the district and surrounding area.

	not be used as a reason for postponing cost-effective measures to prevent environmental degradation.	
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Constraints, conflicts and challenges

There are no constraints or conflicts between the using sound science responsibly plans or policies.

Appendix 2 – Sustainability Framework Baseline: Monitoring

The baseline statistics for the Sustainability Framework (objectives and indicators, as set out in Section 5) are set out below. These are all for monitoring period 2017/18 unless stated otherwise. Some statistics have not yet been published for this period, and where data is awaited it is notated as 'TBC'. Some indicators are not yet monitored; the Council will investigate ways to successfully monitor these in forthcoming monitoring report periods. The next stage of the Sustainability Appraisal process will assess the forecast impact of the policies and allocations against each objective, noting where there is likely to be a positive or negative change compared to the baseline.

1	Indicator	Latest Data (2017/18 unless stated)	Source
To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford	<i>Housing completions per annum (net)</i>	843	MSDC Monitoring 2018
	<i>Number of affordable homes completed annually (gross)</i>	97	MSDC Monitoring 2018
	<i>Financial contributions towards affordable housing provision</i>	£0	MSDC Monitoring 2018
	<i>Number of households accepted as full homeless</i>	TBC	MSDC Monitoring 2018
2	Indicator	Latest Data (2017/18 unless stated)	Source
To improve the access to health, leisure and open space facilities and reduce inequalities in health.	<i>Number of applications resulting in new, extended or improved health facilities</i>	Not Currently Monitored	To be monitored 2018/19
	<i>Number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital</i>	49,480 (82.2%)	MSDC Mapping
	<i>Number of households within 300m of leisure and open space facilities (as defined in the Open Space study)</i>	48,418 (80.4%)	MSDC Mapping
	<i>Financial contributions towards leisure facilities</i>	TBC	MSDC Monitoring 2018
	<i>Amount of additional community facilities delivered</i>	Not Currently Monitored	To be monitored 2018/19
3	Indicator	Latest Data (2017/18 unless stated)	Source
To maintain and improve the opportunities for everyone to acquire the skills needed	<i>Percentage of population of working age qualified to at least NVQ level 3 (or equivalent)</i>	71.7%	Annual Population Survey (NOMIS)
	<i>Percentage of adults with poor literacy and numeracy skills (no</i>	2.5%	Annual Population Survey (NOMIS)

to find and remain in work and improve access to educational facilities.	<i>qualifications)</i>		
	<i>Number of households within a 15 minute walk (approx. 1.2km) from a Primary School</i>	54,062 (89.8%)	MSDC Mapping

4	Indicator	Latest Data (2017/18 unless stated)	Source
To improve access to retail and community facilities.	<i>Number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)</i>	38,771 (64.4%)	MSDC Mapping
	<i>Number of households within a 15 minute walk (approx. 1.2km) from a convenience store</i>	55,129 (91.6%)	MSDC Mapping
	<i>Number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)</i>	Not Currently Monitored	To be monitored 2018/19
	<i>Number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc).</i>	Not Currently Monitored	To be monitored 2018/19

5	Indicator	Latest Data (2017/18 unless stated)	Source
To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities.	<i>All crime – number of crimes per 1000 residents per annum</i>	2013/14: 34.41 per 1,000 residents	Sussex Police
	<i>Number of domestic burglaries per 1,000 households</i>	2013/14: 4.23 per 1,000 households	Sussex Police
	<i>Number of dwellings permitted more than 150m from a built-up area boundary</i>	Not Currently Monitored	To be monitored 2018/19

6	Indicator	Latest Data (2017/18 unless stated)	Source
To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA)	<i>Percentage of the District that is within Flood Zone 2/Flood Zone 3</i>	FZ2: 3.2% FZ3: 2.7%	MSDC SFRA
	<i>Number of properties at risk from flooding, as defined by the Environment Agency</i>	1,411	MSDC Monitoring
	<i>Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds</i>	0	MSDC Monitoring 2018

7	Indicator	Latest Data (2017/18 unless stated)	Source
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.	Percentage of new and converted homes developed on brownfield land	2016/17: 52.5%	MSDC Monitoring 2018
	Percentage of new employment floorspace on previously developed land	Not Currently Monitored	To be monitored 2018/19
	Density of new housing developments	Not Currently Monitored	To be monitored 2018/19
	Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development	Not Currently Monitored	To be monitored 2018/19

8	Indicator	Latest Data (2017/18 unless stated)	Source
To conserve and enhance the District's biodiversity. (SEA)	Number and area of Sites of Nature Conservation Importance (SCNI) and Local; Nature Reserve (LNR) within the District	SCNI: 50 (1,049ha) LNR: 6 (168ha)	MSDC Monitoring 2018
	Area of ancient woodland within the District	5,282ha (15.8%)	MSDC Monitoring 2018
	Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar)	93.8% of SSSIs in favourable or unfavourable but recovering condition	Biodiversity AMR, SxBRC (2017)
	Number of planning applications approved contrary to advice given by Natural England on biodiversity issues	0	MSDC Monitoring 2018
	Number of dwellings permitted within the 7km Zone of Influence (SPA)	429	MSDC Monitoring 2018
	Capacity of Suitable Alternative Natural Greenspace (SANG)	406 dwellings	MSDC Monitoring 2018
	Net gain in biodiversity	Not Currently Monitored	MSDC Monitoring

9	Indicator	Latest Data (2017/18 unless stated)	Source
To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)	Open spaces managed to green flag standard	2 (plus 1 pending accreditation)	MSDC Monitoring 2018
	Number of applications approved contrary to advice from the High Weald AONB unit	3	MSDC Monitoring 2018
	Amount of new development (units) within the High Weald AONB	Not Currently Monitored	
	Number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space)	48,418 (80.4%)	MSDC Monitoring 2018

	<i>Hectares of accessible open space per 1000 population.</i>	Not Currently Monitored	
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10	Indicator	Latest Data (2017/18 unless stated)	Source
To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)	<i>Number of Listed Buildings in the District</i>	1,064	MSDC Monitoring 2018
	<i>Buildings of Grade I and II* and scheduled monuments at risk</i>	2	Historic England
	<i>Number of Conservation Areas in the District</i>	36	MSDC Monitoring 2018
	<i>Number of Conservation Areas with appraisals and management proposals</i>	5 (plus 1 in progress)	MSDC Monitoring 2018

11	Indicator	Latest Data (2017/18 unless stated)	Source
To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)	<i>Number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)</i>	54,850 (91.1%)	MSDC Mapping
	<i>Number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)</i>	58,564 (97.3%)	MSDC Mapping
	<i>Number of households within a 15 minute walk (approx. 1.2km) of a train station</i>	25,309 (42.1%)	MSDC Mapping
	<i>Proportion of journeys to work by public transport</i>	14.3% (train, tube, tram, bus, minibus, coach) 25.4% (as above, plus walk and bicycle)	Census 2011
	<i>Percentage of residents living and working within Mid Sussex</i>	55.55%	Census 2011
	<i>Monetary investment in sustainable transport schemes (value of s.106 agreements)</i>	TBC	MSDC Monitoring 2018
	<i>Number of Air Quality Management Areas (AQMAs) within the District</i>	1	MSDC Monitoring 2018

12	Indicator	Latest Data (2017/18 unless stated)	Source
To increase energy efficiency and the proportion	<i>Domestic energy consumption per household</i>	TBC	MSDC Monitoring 2018
	<i>Number of renewable energy installations within Mid Sussex</i>	1,964	MSDC Monitoring

of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal			2018
	<i>Installed capacity of renewable energy installations within Mid Sussex</i>	21,382MWh	MSDC Monitoring 2018
	<i>Percentage of domestic waste that has been recycled</i>	45%	MSDC Monitoring 2018

13	Indicator	Latest Data (2017/18 unless stated)	Source
To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)	<i>Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"</i>	Good: 1 Moderate: 14 Poor: 8 Bad: 1	Environment Agency
	<i>Stretches of watercourse with no deterioration in Water Framework Directive status</i>	Not Currently Monitored	Environment Agency
	<i>Incidents of major and significant water pollution within the District</i>	3	Environment Agency
	<i>Number of planning applications approved contrary to advice given by the EA on water quality issues</i>	0	MSDC Monitoring 2018

14	Indicator	Latest Data (2017/18 unless stated)	Source
To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	<i>Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)</i>	2,217m ²	MSDC Monitoring 2018
	<i>Number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)</i>	38,771 (64.4%)	MSDC Mapping

15	Indicator	Latest Data (2017/18 unless stated)	Source
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the	<i>Percentage of Mid Sussex residents who are employed</i>	84.7%	NOMIS 2018
	<i>Percentage of Mid Sussex residents who are economically active</i>	85.5%	Annual Population Survey 2018

District.	<i>Average weekly income (gross) for those who are employed in the District</i>	£645.40	Annual Population Survey 2018
	<i>Percentage of residents living and working within Mid Sussex</i>	55.55%	Census 2011
	<i>Job density (ratio of jobs to working age population)</i>	2017: 0.82	ONS Job Density

16	Indicator	Latest Data (2017/18 unless stated)	Source
To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.	<i>Net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace</i>	+14,933m ²	MSDC Monitoring 2018
	<i>Number of businesses within the District</i>	2016: 7,980	MSDC Economic Profile
	<i>Number of new businesses setting up in the District</i>	2014: 905	MSDC Economic Profile

Appendix 3 – Scoping Report Responses

Respondent	Consultation Response	MSDC Response
Environment Agency	<i>Section 3 – Context and Baseline</i> We note that reference is made to the Mid Sussex District Strategic Flood Risk Assessment which was produced in 2008. Whilst I understand that you consider additional information, particularly regarding the use of the Environment Agency’s current day Flood Map for Planning, I would recommend that you consider whether a more comprehensive update of the SFRA is necessary. I would be happy to discuss this with you further.	The references in Section 3 and Appendix 1 to the ‘Strategic Flood Risk Assessment’ have been updated to refer to the SFRA 2015 update. The Council will continue to liaise with the Environment Agency regarding the suitability of the currently approved SFRA.
Environment Agency	<i>Section 4 – Identifying Issues and Problems</i> We support the range of environmental issues identified within the District. We would recommend that the bullet point with regard to flood risk is expanded to include reference to an allowance for climate change and increasing flood risk.	Bullet point in Section 4 has been updated to reflect comments made.
Environment Agency	<i>Section 5 – Objectives and Indicators</i> We support objectives 6-8 and 13 with regard to issues in our remit.	Noted – no further action required.
Environment Agency	Objective 6 – we would recommend that the indicator for this objective is expanded to consider the decisions made that are contrary to the advice of the Lead Local Flood Authority as well as the Environment Agency to ensure that all sources of flood risk are considered.	Indicator updated to reflect comments made.
Environment Agency	Objective 8 – we support the inclusion of this objective but recommend that reference is made to consider the opportunity for the site to achieve a net environmental gain.	Indicator added to reflect comments made.
Environment Agency	Objective 13 – we support the inclusion of this objective but would recommend changes are made to the indicators. With regard to the Water Framework Directive status we would recommend that an indicator considers the stretches of watercourse where there have been improvements in status under the Water Framework Directive, or where there has been no deterioration.	Indicator added to reflect comments made.
Environment Agency	<i>Appendix 1 – Review of Plans, Programmes, Policies,</i>	These documents have been added to the Appendix, as

	<p><i>Strategies, Guidance and Initiatives</i></p> <p>We would recommend that this is expanded to include the following documents:</p> <ul style="list-style-type: none"> - South East River Basin Management Plan which provides the details regarding the status of waterbodies in Mid Sussex District and sets the requirements for their improvement and achieving good ecological status by 2027. - Defra 25 Year Environmental Plan 	suggested.
Historic England	We are content that the scoping report for the DPD adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	Noted – no further action required.
Natural England	<p>Objective 8 – Biodiversity</p> <p>As required by paragraphs 170 (d) and 174 (b) of the NPPF (2018), plans should identify and pursue opportunities for securing measurable net gains for biodiversity and establish coherent ecological networks that are more resilient to current and future pressures. It is advised that objectives and indicators are included which assess the contribution the site allocation DPD makes to ensuring current ecological networks are not compromised, future improvements in habitat connectivity are secured and maintained, and net gains for biodiversity are achieved.</p> <p>In addition to the number of planning applications approved contrary to Natural England’s advice, your authority may consider it useful to quantify of the number of planning approvals generating any adverse impacts on sites of acknowledged biodiversity importance.</p>	<p>An additional indicator has been added to reflect the NPPF requirements related to net biodiversity gain.</p> <p>The addition of an indicator related to planning approvals generating any adverse impacts cannot be added at this time as there is no mechanism in place to monitor it, however it will be investigated during future stages of the Sustainability Appraisal.</p>
Natural England	<p>Objective 9 – Landscape</p> <p>It may be beneficial to include an indicator for the amount of new development in the High Weald Area of Outstanding Natural Beauty (AONB), together with a commentary on the likely impacts. This may provide data on the quantum of</p>	Indicators added to reflect comments made.

	<p>development within the AONB as a whole and may add to data gathered on the number of applications approved contrary to consultee advice. In relation to this, it may be helpful to note that Natural England provides landscape planning advice as a statutory consultee for proposed development schemes requiring an EIA, Nationally Significant Infrastructure Projects (NSIPs) and draft Local Plans. If consulted, Natural England also has a duty to advise a local planning authority about how any scheme would affect a National Park or AONB. As such, your authority may find it useful to include the number of applications approved contrary to Natural England’s advice in addition to advice from the High Weald AONB Unit.</p> <p>Regarding greenspace and green infrastructure, addition of the following two indicators may be useful to measure the overall provision of greenspace within the district, in addition to accessibility indicators:</p> <ul style="list-style-type: none"> · Length of greenways constructed. · Hectares of accessible open space per 1000 population. 	
<p>Natural England</p>	<p>Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPSGIs)</p> <p>Whilst a full review of the plans listed in Appendix 1 has not been undertaken, it is advised that the High Weald AONB Management Plan has now been updated and the 4th edition of the plan covering the period 2019 – 2024 should be referred to. We also advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area:</p> <ul style="list-style-type: none"> • Green infrastructure strategies • Biodiversity plans • Rights of Way Improvement Plans 	<p>Amendments and updates made to Appendix 1 to reflect comments.</p>

Appendix 4 – Housing Site Appraisals

Sites that have been added to these appraisals at Regulation 19 stage are marked with an asterisk (*)

Key - Appraisals

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
?	Uncertain or unknown impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

Note: the performance against “Objective 1 – Housing” reflects the consistency with the residual requirement in that settlement, as well as deliverability.

Key - Conclusion

✓	Performs Well
?	Marginal
✗	Performs Poorly

Site Options: Ansty					
Settlement Category: 4					
Residual Need: N/A (assumed windfall growth only)					
Reasonable Alternatives for Assessment					
<p>A: Land at Ansty Farm, Land north of The Lizard, (Site A), Cuckfield Road. SHELAA#576. Units: 75.</p> <p>B: Challoners, Cuckfield Road. SHELAA#631. Units: 10.</p> <p>C: Ansty Cross Garage, Cuckfield Road. SHELAA#644. Units: 12.</p> <p>D: Extension to allocated Land at Bolney Road. SHELAA#784. Units: 45.</p>					
Objective	A - Ansty Farm	B - Challoners	C - Ansty Cross	D - Bolney Road	Assessment
1 - Housing	+	+	+	0	Site options (b), (c) and (d) would all involve a supply of housing in excess of the residual requirement (Ansty has already met its housing need). These three sites have demonstrated deliverability. Site option (d) could make a significant contribution towards housing supply, but its deliverability is less certain; no response was submitted to the developer questionnaire or the fact checking exercises.
2 - Health	-	-	-	-	All site options are located more than a 20 minute walk from the nearest GP surgery.
3 - Education	-	-	-	-	All site options are located more than a 20 minute walk from the nearest primary school.
4 - Retail	++	++	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	+	-	Site options (a), (b) and (d) are on green field land, though are relatively small sites of less than 100 units. Site (c) is previously developed.
8 - Biodiversity	0	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	-	-	-	All site options are outside the High Weald AONB but have low/medium landscape capacity.
10 - Historic	0	0	0	0	All site options have no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.

12 - Energy/Waste	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	?	?	✓	?	

All sites score negatively on objectives related to health and education. This is to be expected in a Category 4 settlement – the position of Ansty in the settlement hierarchy is based on the fact it does not contain such community infrastructure.

Whilst all sites perform reasonably well individually, option (c) performs the strongest as it is located on a previously developed site.

There is no residual housing requirement at Ansty as it has met its housing need already. However, as option (c) performs well in sustainability terms, and there is a residual requirement overall at Settlement Category 4, this site should be progressed for allocation. Whilst sites (a), (b) and (d) perform well overall, they are not required to meet either the residual housing need at Ansty, or in Category 4 as a whole.

Site Options: Ardingly

Settlement Category: 3
Residual Need: 16

Reasonable Alternatives for Assessment

A: Land west of Selsfield Road. SHELAA#832. **Units: 70.**

Objective	A - Selsfield Road	Assessment
1 - Housing	++	This site option makes a significant contribution towards the residual housing need, and has demonstrated a reasonable prospect of deliverability.

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2 - Health	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	This site option has no areas at risk from flooding, and has not suffered from flooding in the past.
7 - Land Use	-	This site option is on green field land.
8 - Biodiversity	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site.
9 - Countryside	-	This site is wholly within the High Weald AONB and has been assessed as having a moderate impact upon the landscape due to the scale of development. A previous scheme for 100 units was appraised at Regulation 18 stage as “- -”. A reduced scheme is likely to have a lesser impact on the AONB by nature of a reduction in developable area.
10 - Historic	-	This site option has no constraints in terms of listed buildings, but has a less than substantial harm (low) on Ardingly Conservation Area.
11 - Transport	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	
<p>This site performs relatively well against the SA framework. There is a ‘Negative’ impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact and may be reduced as a result of its reduced scale since originally assessed (Regulation 18 stage: 100 units). As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.</p>		

Site Options: Ashurst Wood		
Settlement Category: 3		
Residual Need: N/A (assumed windfall growth only)		
Reasonable Alternatives for Assessment		
A: Land south of Hammerwood Road. SHELAA#138. Units: 12.		
Objective	A - Hammerwood Road	Assessment
1 - Housing	+	This site option makes a contribution towards the residual housing need, and has demonstrated deliverability.
2 - Health	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	This site option has no areas at risk from flooding, or that have suffered from flooding in the past.
7 - Land Use	-	This site option is on green field land, though are relatively small sites of less than 100 units.
8 - Biodiversity	-	This site option will have no biodiversity constraints in terms of Ancient Woodland and SSSI; however, both sites are nearby to Herries Pasture, a Local Wildlife Site.
9 - Countryside	-	This site option is wholly within the High Weald AONB, though would have a low impact upon the landscape.
10 - Historic	0	This site option has no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	This site options on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This site option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.

15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	
There is no residual housing requirement at Ashurst Wood as it has met its housing need already. However, as both options perform well in sustainability terms they should be progressed for allocation. They are small in scale and could make a valuable contribution to wider needs in Category 3.		

Site Options: Bolney

Settlement Category: 3

Residual Need: 30

Reasonable Alternatives for Assessment

A: Land south of Ryecroft Road. SHELAA#264. **Units: 5.**

B: Land West of London Road (north). SHELAA#543. **Units: 81.**

C: Land to west of London Road. SHELAA#741. **Units: 24.**

D*: Land east of Paynesfield, Bolney. SHELAA#526. **Units: 30**

Objective	A - Ryecroft Road	B - London Road (north)	C - London Road	D - Paynesfield	Assessment
1 - Housing	+	++	0	+	Site options (a) and (d) make a contribution towards the residual housing need, and has demonstrated deliverability, while option (b) makes a significant contribution towards the need and has demonstrated a reasonable prospect of deliverability. Site option (c) makes a contribution to the residual housing need but its deliverability is less certain; an option agreement is yet to be agreed with an adjacent land owner which is needed to secure access.
2 - Health	-	-	-	-	All site options are located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	++	++	++	All site options are located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	-	+	+	Options (a), (c) and (d) would encourage the growth of communities. Option (b) is detached from the general form of the village and may not foster community cohesion.
6 - Flood Risk	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.

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7 - Land Use	-	-	-	-	All site options are on green field land, though are relatively small sites of less than 100 units.
8 - Biodiversity	0	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	-	-	-	All site options are outside of the High Weald AONB but are in areas of low landscape capacity.
10 - Historic	--	0	0	--	Site option (a) is constrained in terms of listed buildings and conservation areas; it would have a less than substantial harm (low) on Butchers (Grade II listed), and less than substantial harm (medium) on Bolney Conservation Area. Site option (d) is adjacent to Bolney South conservation area and the Grade I listed St Mary Magdelene church. Site options (b) and (c) have no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	-	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD. Option (b) is located alongside the A23, this may impact residential amenity in terms of noise and air pollution.
12 - Energy/Waste	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	x	x	x	x	
<p>Whilst options (a), (b) and (d) perform positively against the provision of housing objective, there is uncertainty for option (c) which may mean it is not deliverable. The very negative impacts for option (a) with respect to the historic environment are not outweighed by the provision of 5 houses, therefore it is judged to be unsuitable for allocation. Similarly, option (d) performs poorly against the historic environment objective and this is not outweighed by the provision of houses. Whilst option (b) could deliver housing against the residual requirement at Bolney, there are negative impacts in relation to communities, as well as noise/air pollution which may arise as a result of its location adjacent to the busy A23. The positives of allocating this site are therefore outweighed by the negatives. For all site options, it is likely that there are more positive performing sites within this settlement tier, or within the tier above.</p>					

Site Options: Burgess Hill

Settlement Category: 1
Residual Need: N/A (assumed windfall growth only)

Reasonable Alternatives for Assessment

- A:** Wintons Farm, Folders Lane. SHELAA#4. **Units: 13.**
- B:** St. Wilfrids Catholic Primary School, School Close. SHELAA#345. **Units: 200.**
- C:** Land south of Folders Lane and east of Keymer Road. SHELAA#557. **Units: 200.**
- D:** Land South of Southway. SHELAA#594. **Units: 30.**
- E:** The Garage, 1 Janes Lane. SHELAA#646. **Units: 9.**
- F:** Land east of Greenacres, Keymer Road and south of Folders Lane. SHELAA#738. **Units: 100.**
- G:** Land South of 96 Folders Lane. SHELAA#827. **Units: 43.**
- H:** Woodfield House, Isaacs Lane. SHELAA#840. **Units: 30.**
- I:** Land to the south of Selby Close, Hammonds Ridge. SHELAA#904. **Units: 12.**

Objective	A - Wintons	B - St Wilfrids	C - S.Folders Ln	D - Southway	E - The Garage	F - Greenacres	G - S.96 Folders Ln	H - Woodfield	I - Selby Close	Assessment
1 - Housing	0	+	++	+	0	++	+	+	+	Options (c) and (f) could make a significant contribution towards the residual housing need, and have demonstrated deliverability. Options (b), (d), (g), (h) and (i) are smaller in scale (noting that part of the St Wilfrid’s site is already committed, this score relates to any additional development) but would make a contribution towards residual housing need, they have also demonstrated deliverability. Options (a) and (e) has been submitted to the Council however deliverability is unclear.
2 - Health	+	++	+	+	0	+	-	?	-	Site option (b) is located less than a 10 minute walk from the nearest GP surgery, options (a), (c), (d) and (f) are a 10-15 minute walk, option (e) is a 15-20 minute walk, while option (g) and (i) are more than a 20 minute walk. The impact of option (h) on this objective is uncertain; currently the site is a long distance from local services, however, this will change once the Northern Arc is built out.
3 - Education	++	+	++	++	++	++	-	?	-	Site option (a), (c), (d), (e) and (f) are located less than a 10 minute walk from the nearest GP surgery, option (b), is a 10-15 minute walk, while option (g) and (i) are

										more than a 20 minute walk. The impact of option (h) on this objective is uncertain; currently the site is a long distance from local services, however, this will change once the Northern Arc is built out.
4 - Retail	+	++	+	++	++	+	-	?	++	Site option (b), (d), (e) and (i) are located less than a 10 minute walk from the nearest convenience store, option (a), (c) and (f) are a 10-15 minute walk while option (g) is more than a 20 minute walk. The impact of option (h) on this objective is uncertain; currently the site is a long distance from local services, however, this will change once the Northern Arc is built out.
5 - Communities	+	+	+	+	+	+	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	0	0	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	--	++	--	-	++	--	-	-	-	Site option (d), (g), (h) and (i) are on green field land, and are relatively small sites. Option (a), (c) and (f) are also on green field land, but are relatively large. Options (b) and (e) are on previously developed land so have the most positive impact on this sustainability objective.
8 - Biodiversity	0	0	0	0	0	0	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	0	-	0	0	-	-	-	0	All site options are outside of the High Weald AONB. Site options (a), (c), (f), and (g) in are in areas of medium landscape capacity while option (h) is in an area of low/medium capacity. Site options (b), (d), (e) and (i) are within the built up area settlement boundary of Burgess Hill, hence have a high landscape capacity.
10 - Historic	0	0	0	0	0	-	0	0	0	All site options have no constraints in terms of listed buildings and conservation areas, apart from option (f) which is not constrained by a conservation area, but would have a less than substantial harm (medium) on High Chimneys (Grade II listed).
11 - Transport	?	?	?	?	?	?	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	?	?	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	?	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	+	++	+	++	++	+	-	-	++	All site options perform positively against this objective as the sites are in close proximity to the town centre. Sites options (b), (d), (e) and (i) have a significantly positive impact as they are very close to the town centre. Options (g) and (h) are remote from the existing town centre, so have a negative impact on this objective.

15 - Employment	?	+	+	+	+	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections. Because site option (a) could negatively impact upon an existing business, the impact upon this objective is uncertain.
16 - Ec. Growth	?	+	+	+	+	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon. Because site option (a) could negatively impact upon an existing business, the impact upon this objective is uncertain.
Conclusion	✘	✓	?	✓	✘	?	?	✓	✓	

Options (a) and (e) have been assessed as not suitable for allocation at this stage as the prospects of delivery are uncertain. Options (b), (d), (h) and (i) are relatively small-scale and perform positively against the sustainability criteria overall – the benefits outweigh negatives and mitigation could be included within site specific policies to ensure that any potential negative impacts are reduced.

Options (c), (f) and (g) perform relatively well against the sustainability criteria – these sites can be considered collectively as they are located in close proximity. Whilst the housing need for Burgess Hill can be met without requiring these sites, they are in a sustainable location with respect to services therefore could be suitable to meet additional need at Burgess Hill should it be required (for example due to under-allocation at lower tiers in the settlement hierarchy).

Site Options: Crawley Down		
Settlement Category: 2		
Residual Need: N/A (assumed windfall growth only)		
Reasonable Alternatives for Assessment		
A: Land north of Burleigh Lane. SHELAA#519. Units: 50.		
Objective	A - Burleigh Lane	Assessment
1 - Housing	++	This site option makes a significant contribution towards the residual housing need, and has demonstrated a reasonable prospect of deliverability.
2 - Health	++	This site option is located less than a 10 minute walk from the nearest GP surgery.
3 - Education	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	This site option would encourage the growth of communities.

6 - Flood Risk	0	This site option has no areas at risk from flooding, or that have suffered from flooding in the past.
7 - Land Use	-	This site option is on green field land, and is a relatively small site.
8 - Biodiversity	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site option.
9 - Countryside	-	This site option is outside of the High Weald AONB but is in an area of medium landscape capacity.
10 - Historic	0	This site option has no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This site option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	
<p>Site (a) performs positively overall, particularly against the social objectives. Negative impacts are expected on land use, countryside and energy/waste objectives however this is common to all sites assessed (these objectives are generally in conflict with housebuilding, as discussed in section 5 of the report). The yield for this site is greater than the residual required in Crawley Down, however as this is a Category 2 settlement (the second most sustainable category in the settlement hierarchy) this is acceptable. This site should therefore be progressed for allocation.</p>		

Site Options: Cuckfield				
Settlement Category: 2				
Residual Need: 198				
Reasonable Alternatives for Assessment				
<p>A: Land to the north of Glebe Road. SHELAA#227. Units: 84.</p> <p>B: Land at Hanlye Lane to the east of Ardingly Road. SHELAA#479. Units: 55.</p> <p>C: Land to East of Polestub Lane. SHELAA#567. Units: 120.</p>				
Objective	A - Glebe Road	B - Hanlye Lane	C - Polestub Lane	Assessment
1 - Housing	0	+	0	Site options (a) and (c) could make a significant contribution towards the residual housing need, but deliverability of the sites are somewhat uncertain; option (a) cannot come forward until an overage agreement expires in 4.5 years, while option (c) has no arrangements in place to bring the site forward. Site option (b) makes a significant contribution towards the residual housing need, and has demonstrated a reasonable prospect of deliverability.
2 - Health	++	++	++	All site options are located less than a 10 minute walk from the nearest GP surgery.
3 - Education	++	++	++	All site options are located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	--	Site option (a) and (b) are on green field land, and is a relatively small site. Option (c) is also on green field land, but is relatively large.
8 - Biodiversity	0	-	0	Site options (a) and (c) have no biodiversity constraints in terms of Ancient Woodland, SSSI and LNRs. Site option (b) has no constraints in terms of SSSI and LNRs, however, a small area in the south east corner of the site is affected by a 15m ancient woodland buffer.
9 - Countryside	-	-	-	All site options are outside of the High Weald AONB but are in areas of low/medium landscape capacity.
10 - Historic	0	0	0	All site options have no constraints in terms of listed buildings and conservation areas.
11 - Transport	-	?	-	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD. A suitable and safe access for sites (a) and (c) have not been demonstrated.

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12 - Energy/Waste	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✗	✓	✗	
<p>Site options (a) and (c) have not been able to demonstrate delivery; therefore it is uncertain whether they could contribute towards residual housing needs. Whilst they both perform more positively against the biodiversity objective, the impact of option (b) on ancient woodland could be mitigated.</p> <p>As option (b) performs positively against the social and economic objectives, and has no adverse negative impacts against the environmental objectives, this site should be progressed for allocation in order to contribute towards the residual housing requirement in Cuckfield.</p>				

Site Options: East Grinstead								
Settlement Category: 1 Residual Need: 706								
Reasonable Alternatives for Assessment								
A: Land south of Crawley Down Road, Felbridge. SHELAA#196. Units: 200. B: Land at Brooklands Park, west of Orchard Way. SHELAA#224. Units: 15. C: Land at Brookhurst, Furze Lane. SHELAA#595. Units: 7. D: Carpet Right, 220 - 228 London Road. SHELAA#763. Units: 24. E: Land south and west of Imberhorne Upper School, Imberhorne Lane. SHELAA#770. Units: 550. F: East Grinstead Police Station, College Lane. SHELAA#847. Units: 22 G: Old Court House, East Grinstead. SHELAA#998. Units: 12.								
Objective	A - Crawley Down Road	B - Brooklands	C - Brookhurst	D - Carpet Right	E - Imberhorne	F - EG Police Stn.	G - Old Court House.	Assessment
1 - Housing	+	?	?	?	++	+	?	Site options (a) and (f) make a contribution towards the residual housing need, and have demonstrated a reasonable prospect of deliverability. Option (e) makes a significant contribution towards the residual housing need, and has demonstrated deliverability. Detailed site work has concluded that it is uncertain whether the suggested yields would be possible on sites (b), (c) and (d) due the layout/constraints of the site. It is unclear whether site (g) is available for development.
2 - Health	-	++	-	++	-	+	+	Site option (b) and (d) are located less than a 10 minute walk from the nearest GP surgery, option (f) is a 10-15 minute walk, while option (a) and (c) are more than a 20 minute walk.
3 - Education	++	+	+	++	++	++	++	Site option (a), (d), (e), (f) and (g) are located less than a 10 minute walk from the nearest primary school, while option (b) and (c) are a 10-15 minute walk.
4 - Retail	++	++	++	++	+	+	+	Site option (a), (b), (c) and (d) are located less than a 10 minute walk from the nearest convenience store, while option (e), (f) and (g) are a 10-15 minute walk.
5 - Communities	+	+	+	+	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	-	0	0	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past, apart from site option (a), the southern boundary of the site is within flood zone 2/3.

7 - Land Use	--	-	-	++	--	++	++	Site option (b) and (c) are on green field land, and are relatively small sites. Option (a) and (e) are also on green field land, but are relatively large. Options (d), (f) and (g) are on previously developed land.
8 - Biodiversity	-	0	0	0	-	0	0	Site options (b), (c), (d) and (f) have no biodiversity constraints in terms of Ancient Woodland, SSSI and LNRs. Site option (a) and (e) are not constrained by Ancient Woodland, but are nearby to Hedgecourt SSSI in Tandridge District; Natural England have concerns over the high density of housing south of Felbridge. Site option (e) is also adjacent to the Worth Way, Local Wildlife Site.
9 - Countryside	-	0	-	0	0	-	-	All site options are outside of the High Weald AONB. Site options (b) and (d) are in areas of high landscape capacity, while option (e) is in an area of medium/high capacity. Site options (a) and (c) are in areas of medium while options (f) and (g) is in an area of low/medium landscape capacity.
10 - Historic	0	0	0	0	-	0	0	All site options have no constraints in terms of listed buildings and conservation areas, apart from option (e) which is not constrained by a conservation area, but would have a less than substantial harm (high) on Gullege Farm (Grade II listed) and Imberhorne Farm and Imberhorne Cottages (Grade II* listed). As this is a large site, there is potential to still achieve the yield whilst providing necessary mitigation to lower the impact on these heritage assets.
11 - Transport	?	?	?	?	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	++	+	+	+	All site options perform positively against this objective. Sites options (e), (f) and (g) are less positive than the rest because they are more remote from the town centre.
15 - Employment	+	+	+	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	✗	✗	✗	✓	✓	?	

East Grinstead is a Category 1 settlement with a large residual housing requirement. Therefore weight should be afforded to sites that could contribute towards the residual requirement provided there are no significant negative impacts that would outweigh the positives of providing housing. Sites (b), (c) and (d) are relatively small sites in the context of the settlement and compared to other options. There is uncertainty regarding delivery of the yield these sites have been promoted for, due to layout constraints onsite. Site (d) is within the built-up area and could be brought forward through a planning application should constraints be addressable. All other site options have been assessed as deliverable and able to make a contribution towards the housing requirement in this location. Whilst (a) and (e) perform very negatively on the Land Use objective, this is to be expected given their size and conflict with this objective (as explained in section 5 of this report). There are no

other significant environmental impacts; any negative impacts likely to arise are outweighed by positive social and economic impacts. Therefore sites (a), (e) and (f) should be progressed for allocation.

Site Options: Handcross

Settlement Category: 3

Residual Need: N/A (assumed windfall growth only)

Reasonable Alternatives for Assessment

A: Land at St. Martin Close. SHELAA#127. **Units:** 65.

Objective	A - St. Martin Close	Assessment
1 - Housing	++	This site option makes a significant contribution towards the residual housing need, and has demonstrated a reasonable prospect of deliverability.
2 - Health	0	This site option is located less than a 15-20 minute walk from the nearest GP surgery.
3 - Education	0	This site option is located less than a 15-20 minute walk from the nearest primary school.
4 - Retail	+	This site option is located a 10-15 minute walk from the nearest convenience store.
5 - Communities	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	This site option has no areas at risk from flooding, or that have suffered from flooding in the past.
7 - Land Use	-	This site option is on green field land, and is a relatively small site.
8 - Biodiversity	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site option.
9 - Countryside	--	This site option is wholly within the High Weald AONB and would have a moderate impact upon the landscape due to the scale of development, loss of open fields and potential impact on hedgerows and trees.
10 - Historic	0	This site option has no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This site option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from

		housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	+	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	
<p>This site performs positively against the social and economic objectives. There is predicted to be a very negative impact on the countryside objective, due to the site's location within the High Weald AONB. However, half of this site has been allocated within the Slaugham Neighbourhood Plan (30 units) with the other half identified as a 'reserve' site. Therefore the principle of developing this site has been accepted, and various mitigation measures have been put in place within the Neighbourhood Plan. Mitigation measures can also be included within the Site Allocations DPD policy in order to reduce its impact. Therefore, in order to contribute to wider residual housing need at Category 3, this site should be progressed for allocation.</p>		

Site Options: Hassocks

Settlement Category: 2

Residual Need: N/A (assumed windfall growth only)

Reasonable Alternatives for Assessment

A: Land opposite Stanford Avenue, London Road. SHELAA#210. **Units: 45.**

B: Land to the north of Shepherds Walk. SHELAA#221. **Units: 130.**

Objective	A - Stanford Avenue	B - Shepherds	Assessment
1 - Housing	+	++	All site options make a significant contribution towards the residual housing need, and have demonstrated deliverability.
2 - Health	+	0	Site options (a) is located a 10-15 minute walk from the nearest GP surgery, while option (b) is a 15-20 minute walk.
3 - Education	0	+	Site options (a) is located a 15-20 minute walk from the nearest primary school, while option (b) is a 10-15 minute walk.
4 - Retail	++	+	Site options (a) is located less than a 10 minute walk from the nearest convenience store, while option (b) is a 10-15 minute walk.
5 - Communities	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	-	Site option (a) is not in an area at risk from flooding, or have suffered from flooding in the past. Option (b) is partially within an area of flood zone 2/3, previous planning applications for this site can show this can be mitigated.

7 - Land Use	-	-	Site options (a) and (b) are on green field land
8 - Biodiversity	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	-	All site options are outside of the High Weald AONB but are in areas of low landscape capacity.
10 - Historic	0	0	All site options have no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	?	✓	
<p>Option (b) performs positively overall against the sustainability framework. It would make a contribution to housing need at this settlement, and performs well overall against the Social objectives. Whilst there are negative impacts associated with option (b), these can be mitigated – policy requirements can ensure this is the case. Whilst option (a) performs positively against the sustainability framework, option (b) performs more positively and its potential allocation can contribute towards growth required at category 2 in the settlement hierarchy. Option (a) may therefore only be required in this settlement should there remain an unmet need within this category, that couldn't be accommodated at higher tiers in the hierarchy.</p>			

Site Options: Haywards Heath

Settlement Category: 1

Residual Need: N/A (assumed windfall growth only)

Reasonable Alternatives for Assessment

A: MSDC Car Park, north of Oaklands Road. SHELAA#618. **Units: 8.**

B: Rogers Farm, Fox Hill, Haywards Heath. SHELAA#783. **Units: 25.**

C: Haywards Heath Golf Course, High Beech Lane, Haywards Heath. SHELAA#503. **Units: 630.**

D*: Land to the north of Old Wickham Lane. SHELAA#988. **Units: 60.**

Objective	A - Oaklands	B - Rogers Farm	C - HH Golf Course	D - N. Old Wickham	Assessment
1 - Housing	+	+	++	+	All site options have demonstrated their deliverability; options (a), (b) and (d) make a contribution to the residual housing need, while (c) makes a significant contribution to the need.
2 - Health	++	0	++	-	Site options (a) and (c) are located a 10-15 minute walk from the nearest GP surgery, while option (b) is a 15-20 minute walk. Option (d) is more than a 20 minute walk.
3 - Education	+	-	++	+	Site option (c) is located less than a 10 minute walk from the nearest primary school, options (a) and (d) are a 10-15 minute walk, while option (b) is more than a 20 minute walk.
4 - Retail	++	+	++	+	Site options (a) and (c) is located less than a 10 minute walk from the nearest convenience store, while options (b) and (d) are a 10-15 minute walk.
5 - Communities	+	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	--	-	Site options (a), (b) and (c) are on green field land, and are relatively small sites. Option (c) is also on green field land, but is relatively large-scale.
8 - Biodiversity	0	0	-	-	Site options (a) and (b) have no biodiversity constraints in terms of Ancient Woodland, SSSI and LNRs. Site option (c) has some areas of ancient woodland on the site, and is adjacent to Wickham Wood, Local Wildlife Site, with some overlaps of boundaries in the South West corner. For option (d), the site's north east corner intersects with a small area of the Birchen Wood ancient woodland including 15m buffer area.
9 - Countryside	0	-	-	0	All site options are outside of the High Weald AONB. Site option (a) is within an area of high landscape capacity, option (c) is in an area of medium capacity, option (d) is within an area of medium/high landscape capacity, while option (b) is in an area of low/medium capacity.

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10 - Historic	0	-	0	--	Site option (a) and (c) have no constraints in terms of listed buildings and conservation areas. Site option (b) is constrained in terms of impact upon a listed building; it would have a less than substantial harm (medium) on Cleavewater (Grade II listed) and The Old Cottage (Grade II listed). Site option (d) is adjacent to two Grade II* listed buildings – Wickham Farm and Sunte House.
11 - Transport	?	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	+	++	++	All site options perform positively against this objective. Site option (b) is less positive than the others because it is more remote from the town centre.
15 - Employment	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✘	✓	?	✘	
<p>Whilst option (a) performs relatively positively against the sustainability objectives, it is a small-site within the built-up area and may progress as a ‘windfall’ site (there has been planning history to suggest this is the case). Option (b) performs positively overall against the Social objectives, plus site promoters have been able to suggest mitigation that would reduce the impact on the Environmental objectives. As Haywards Heath is a Category 1 settlement, the sustainability benefits to this site mean it is suitable for allocation. Whilst option (c) performs very positively against the Social objectives due to its size and scale, it is significantly beyond the residual need within this settlement. There are very negative impacts expected for the Land Use objective, as well as negatives related to biodiversity (due to the areas of ancient woodland within the sites and adjacency to a wildlife site). Therefore, at this stage it is not proposed that this site is required to meet the need of Haywards Heath or Category 1 as a whole, however may be required should this need be unmet following assessment of all sites within this category. Option (d) performs positively against the social objectives although is distant from health facilities. There is potential for very negative impacts to arise against the Historic objective due to its proximity to two Grade II* listed buildings.</p>					

Site Options: Horsted Keynes

Settlement Category: 3

Residual Need: 70

Reasonable Alternatives for Assessment

A: Land south of St. Stephens Church, Hamsland. SHELAA#184. **Units: 30.**

B: Land at Police House Field, Birch Grove Road/Danehill Lane. SHELAA#216. **Units: 10.**

C: Land South of The Old Police House, Birchgrove Road, Horsted Keynes. SHELAA#807. **Units: 25.**

Objective	A – St. Stephens	B - Police House Field	C - The Old Police House	Assessment
1 - Housing	++	++	++	All site options make a contribution towards the residual housing need; all options have demonstrated their deliverability.
2 - Health	-	-	-	All site options are located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	++	++	All site options are located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	-	All site options are on green field land, however are relatively small sites.
8 - Biodiversity	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	--	--	All site options are wholly within the High Weald AONB. Site options (b) and (c) could have a moderate impact on this landscape, while option (a) could have a low impact.
10 - Historic	0	?	?	Site option (a) has no constraints in terms of listed buildings and conservation areas. Options (b) and (c) lie opposite a listed building; however the harm to this building has been assessed a low and suitable mitigation can be achieved.
11 - Transport	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.

13 - Water	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	✓	✓	
<p>All site score relatively positively on the social objectives. All options are within the High Weald AONB, hence negative impacts on the countryside objective. Options (b) and (c) are likely to have a greater impact than (a); however the impact has not been assessed as 'High' by the High Weald AONB unit. It is generally accepted (through adoption of the District Plan residual housing requirements for settlements) that development will take place within the AONB at settlements that are entirely within it.</p> <p>The sites perform positively overall, negatives could be mitigated, and there is a residual need at this settlement and Category 3 as a whole. Therefore, all three sites should be progressed for allocation.</p>				

Site Options: Hurstpierpoint

Settlement Category: 2

Residual Need: N/A (assumed windfall growth only)

Reasonable Alternatives for Assessment

A: Land west of Kemps. SHELAA#13. **Units: 114.**

B: Land east of College Lane. SHELAA#19. **Units: 165.**

C: Land to the rear of 78 Wickham Hill, Hurstpierpoint. SHELAA#164. **Units: 18.**

Objective	A - Kemps	B - College Lane	C - Wickham Hill	Assessment
1 - Housing	++	++	0	Site option (a) and (b) make a significant contribution towards the residual housing need, and have demonstrated deliverability. Site option (c) makes a contribution towards the residual housing need, but has uncertain deliverability, with no timescale planned for developing the site.
2 - Health	+	+	+	All site options are located a 10-15 minute walk from the nearest GP surgery.

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3 - Education	++	0	0	Site option (a) is located less than a 10 minute walk from the nearest primary school, while option (b) and (c) is a 15-20 minute walk.
4 - Retail	++	+	+	Site options (a) is located less than a 10 minute walk from the nearest convenience store, while option (b) and (c) is a 10-15 minute walk.
5 - Communities	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	--	--	-	Site option (a) and (b) are on green field land, and are relatively large sites. Option (c) is also on green field land, but is a relatively small site.
8 - Biodiversity	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	-	-	All site options are outside of the High Weald AONB but are in areas of low landscape capacity.
10 - Historic	-	-	0	Site option (c) has no constraints in terms of listed buildings and conservation areas. Options (a) and (b) are not constrained by a conservation area, but impact upon a listed building; Wickham Farmhouse (Grade II* listed)
11 - Transport	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	+	+	All site options perform positively against this objective. Site option (a) is more positive than the others because it is in closer proximity to the village centre.
15 - Employment	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	?	?	×	
<p>Site (c) has not been able to demonstrate deliverability, particularly for the number of units suggested. Whilst it performs positively compared to the other two options as a whole, deliverability questions mean that the site shouldn't be progressed, particularly as Hurstpierpoint has met its residual housing requirement. Site options (a) and (b) perform largely positively, particularly against the social objectives, however are large sites on greenfield land. Similarly, both could have negative impacts on the nearby listed building. As Hurstpierpoint has met its residual need, and there are potential negative impacts arising, these sites are concluded as 'Marginal' as they may not be required at this stage.</p>				

Site Options: Lindfield		
Settlement Category: 2		
Residual Need: N/A (assumed windfall growth only)		
Reasonable Alternatives for Assessment		
A: Land at Walstead Grange, Scamps Hill. SHELAA#983 Units: 270.		
Objective	A - Walstead Grange	Assessment
1 - Housing	++	Site option (a) would make a significant contribution towards the residual housing need, and has demonstrated deliverability.
2 - Health	+	This site option is located less than a 10-15 minute walk from the nearest health facility.
3 - Education	+	This site option is located less than a 10-15 minute walk from the nearest primary school.
4 - Retail	+	This site option is located less than a 10-15 minute walk from the nearest convenience store.
5 - Communities	+	This site would encourage the growth of communities.
6 - Flood Risk	-	A section within the east of the site, and the western boundary are within Flood Zone 2/3. Parts of the site are susceptible to surface water flooding.
7 - Land Use	--	This site is on green field land and is large in scale.
8 - Biodiversity	-	The site is bordered by ancient woodland to the north-east, part of the site is within the 15m buffer.
9 - Countryside	-	This site option is within an area of low capacity in landscape terms.
10 - Historic	-	The site is adjacent to the Grade II-listed Tythe Cottage
11 - Transport	?	This site option is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option would impact on the amount of waste generated, due to additional population generated from housing as well as during construction. It should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option will impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. It should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	This option performs positively against this objective because it is in close proximity to the village centre.

15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	x	
<p>This option performs positively against the social objectives. Lindfield has met its housing need, therefore provision of housing on this site would be beyond the requirement at this location. However, the site performs negatively against the environmental objectives, particularly impacting flood risk, landscape and ancient woodland. The scale of this site is also likely to have a very negative impact on the land use objective.</p> <p>Overall, the negatives likely to arise from this site are not likely to be outweighed by the positives. It is likely that better performing sites are available within this settlement tier, or the tier above.</p>		

Site Options: Sayers Common

Settlement Category: 3
Residual Need: 15

Reasonable Alternatives for Assessment

- A:** Land south of Furzeland Way. SHELAA#491. **Units: 12.**
- B:** Land at Whitehorse Lodge, Furzeland Way. SHELAA#613. **Units: 9.**
- C:** Land to the north Lyndon, Reeds Lane. SHELAA#829. **Units: 35.**
- D:** Land to the west of Kings Business Centre, Reeds Lane. SHELAA#830. **Units: 100.**

Objective	A - Furzeland	B - Whitehorse	C - Lyndon	D - Kings Business	Assessment
1 - Housing	?	?	++	++	Options (a) and (b) make small contributions towards the residual housing need however site layout constraints may mean the suggested yields cannot be delivered. Options (c) and (d) make a significant contribute towards the need and have been assessed as deliverable.
2 - Health	-	-	-	-	All site options are located more than a 20 minute walk from the nearest GP surgery.
3 - Education	0	0	-	-	Site options (a) and (b) is located a 15-20 minute walk from the nearest primary school, while option (c) and (d) is over a 20 minute walk.
4 - Retail	++	++	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.

5 - Communities	+	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	-	--	Site option (a), (b) and (c) are on green field land, and are relatively small sites. Option (d) is also on green field land, but is relatively large.
8 - Biodiversity	0	0	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	-	-	-	-	All site options are outside of the High Weald AONB but are in areas of medium landscape capacity.
10 - Historic	0	0	0	0	All site options have no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	×	×	✓	?	

Sites (a) and (b) are relatively small sites, and would make a small contribution towards the residual need, however the deliverability of this yield is questioned given constraints on site.

Site (c) would make a positive contribution towards the residual housing need in Sayers Common. It does not perform well against the other social objectives; however this is due to the lack of services within Sayers Common itself (which is to be expected within a Category 3 settlement). There are no other constraints or negative impacts that outweigh the positive impacts expected – the site therefore should be progressed for allocation in order to contribute towards the residual requirement at Sayers Common. Site (d) performs similarly however is likely to have a more negative impact on the land use objective due to its size. As the residual requirement can be met by site (c), the addition of site (d) would be significantly in excess of the residual requirement at this settlement, therefore is not required at this stage.

Site Options: Scaynes Hill
Settlement Category: 3 Residual Need: 119
Reasonable Alternatives for Assessment

A: Land to the rear Firlands, Church Road. SHELAA#897. Units: 20.

Objective	A - Firlands	Assessment
1 - Housing	++	This site option makes a significant contribution towards the residual housing need, and has demonstrated deliverability.
2 - Health	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	This site option has no areas at risk from flooding, or that have suffered from flooding in the past.
7 - Land Use	-	This site option is on green field land, and is a relatively small site.
8 - Biodiversity	-	This site option has no biodiversity constraints in terms of Ancient Woodland, though is nearby to Scaynes Hill Common, Local Wildlife Site.
9 - Countryside	-	This site option is outside of the High Weald AONB but is in an area of medium landscape capacity.
10 - Historic	0	This site option has no constraints in terms of listed buildings and conservation areas.
11 - Transport	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓	
<p>This site scores positively against the social and economic objectives. Whilst there are a number of negative impacts expected, mitigation could address any biodiversity issues. The other negatives are expected as they are in conflict with housing development in general (as explained in section 5 of this report). Any negatives are outweighed by positives.</p> <p>There is an overall residual requirement of 146 in Scaynes Hill, therefore this site should be progressed for allocation as it scores positively overall, and would contribute towards this residual need.</p>		

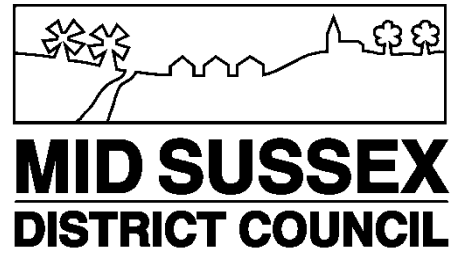
Site Options: Turners Hill			
Settlement Category: 3			
Residual Need: 60			
Reasonable Alternatives for Assessment			
A: Land adjacent to 18 East Street. SHELAA#474. Units: 6.			
B: Withypitts Farm, Selsfield Road. SHELAA#854. Units: 16.			
Objective	A - East Street	B - Withypitts	Assessment
1 - Housing	?	+	Whilst option (a) has been promoted and there is a reasonable prospect of delivery, it is uncertain whether the site constraints/layout would yield 6 dwellings. Option (b) could make a contribution towards the residual housing need, and has demonstrated a reasonable prospect deliverability.
2 - Health	++	+	Site option (a) is located less than a 10 minute walk from the nearest GP surgery, while option (b) is a 10-15 minute walk.
3 - Education	++	++	All site options are located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	All site options are located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	Site option (a) and (b) are on green field land, and are relatively small sites.
8 - Biodiversity	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to any of the site options.
9 - Countryside	--	--	All site options are wholly within the High Weald AONB and could have a moderate impact on this landscape.
10 - Historic	-	0	Site option (b) has no constraints in terms of listed buildings and conservation areas. Site option (a) is constrained in terms of listed buildings and conservation areas; it would have a less than substantial harm (low) on Newstone Cottages (all Grade II listed), and less than substantial harm (low) on Turners Hill Conservation Area.
11 - Transport	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.

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13 - Water	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	All site options perform positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✗	✓	
<p>Whilst option (a) performs largely positively, there are concerns about its ability to deliver the proposed yield. There is also potential for a negative impact on nearby listed buildings. Overall it is not concluded that the site should be progressed for allocation. Although site option (b) performs very negatively against the countryside criteria due to its location within the High Weald AONB, it is generally accepted (through adoption of the District Plan residual housing requirements for settlements) that development will take place within the AONB at settlements that are entirely within it. As there is a residual need in this settlement, and option (b) is small (therefore minimising potential negative impacts) and could make a contribution towards it, this site should be progressed for allocation.</p>			

Appendix 5 – Main Modifications Addendum

Mid Sussex



Site Allocations DPD
Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)

Main Modifications Addendum

November 2021

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Site Allocations DPD Sustainability Appraisal – Main Modifications November 2021

1. Introduction and Background

4.3. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”⁸. It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:

- **Social**
- **Environmental**
- **Economic**

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

4.4. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires Development Plan Documents (DPDs) to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of the Site Allocations DPD (Sites DPD) – promoting sites, strategy or policy that is sustainable, and ruling out sites, strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Sites DPD, whilst documenting how the plan meets the legal and policy requirements. The SA report also contains the elements required by the Strategic Environmental Assessment (SEA) directive as set out in the European Directive 2001/42/EC, adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.

The Sustainability Appraisal Report

- 4.5. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development of different options for site allocations in the Sites DPD as well as any generic policies that the document may contain. The findings of this work have been taken into consideration in determining the content of the Sites DPD and are documented within this report. This process will be repeated at all formal stages of the Sites DPD.
- 4.6. The Sustainability Appraisal process, along with the Strategic Environmental Assessment process, has widened the range of issues and options considered in formulating the proposals for the Sites DPD, in particular by focussing attention on the need to consider a range of potential social, economic and environmental effects. In turn, this has enabled the most sustainable policy approaches to be identified for inclusion within the Sites DPD.
- 4.7. A Sustainability Appraisal Report accompanied both the Regulation 18 and Regulation 19 versions of the Sites DPD. These were submitted to the Planning Inspectorate alongside the Sites DPD and supporting evidence in December 2020.

⁸ The Report of the Brundtland Commission, 1987

- 4.8. The Sites DPD was subject to public hearings in June 2021. Following the hearings, the Inspector suggested a range of Main Modifications which would be necessary for the Sites DPD to be found 'sound'. The Sustainability Appraisal process is an iterative one – this version of the SA assesses the sustainability implications of the Main Modifications.

2. Site Allocations DPD: Sustainability Appraisal Context and Methodology

- 5.1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The District Plan shapes the future of Mid Sussex by providing a framework for new development, employment growth, infrastructure, and measures to protect the countryside and other valuable assets. The District Plan was accompanied by its own Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to ensure the Plan was the most sustainable given all reasonable alternatives.
- 5.2. The Mid Sussex District Plan identified:
- A total housing need of 16,390 homes for the period 2014-2031; inclusive of a contribution towards meeting unmet housing need in neighbouring authorities (policies **DP4: Housing** and **DP6: Settlement Hierarchy**)
 - Strategic Housing Allocations at Burgess Hill (**DP8 – DP9**), Hassocks (**DP11**) and Pease Pottage (**DP10**)
 - A total of 25ha employment space (policy **DP1: Sustainable Economic Development**).
- 5.3. Whilst the majority of the housing need has been planned for within the District Plan (either through completions, committed sites (those with allocations of planning permission) or the strategic sites listed above), there is a residual housing need.
- 5.4. Policy **DP4: Housing** identifies this ‘residual need’ and commits the Council to preparing a Site Allocations DPD in order to allocate sufficient sites to meet it. The DPD is also able to identify sites for other uses, such as employment, to meet any remaining need that was not identified within the District Plan.
- 5.5. The residual housing need figure has now been updated (as at 1st April 2021), and shows that the Site Allocations DPD will be required to plan for a minimum of 797 dwellings. The employment need position has also been updated, to take account of up-to-date employment forecasts and any changes since the District Plan was adopted. This work identifies a need for an additional 10-15ha of employment land.
- 5.6. The District Plan sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:
- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - iv) to set out additional Strategic Policies necessary to deliver sustainable development.
- 5.7. The purpose of the Site Allocations DPD is therefore to plan for a minimum of 797 dwellings and 10-15ha of employment land by allocating sufficient sites.

Methodology

- 5.8. To undertake a Sustainability Appraisal of the Site Allocations DPD, the council collected data about the district on social, environmental and economic issues. This is known as the 'baseline' and is documented in section 3 of the Regulation 18 and Regulation 19 main reports. This information enables the current (and potential future) social, environmental and economic issues facing the district to be established. The baseline consists of quantitative data as well as qualitative data – a review of all plans, programmes and policies that impact upon the Site Allocations DPD was also established to form a picture of the issues and challenges facing the district.
- 5.9. From this information, it was possible to identify sustainability objectives that the emerging policy options within the Site Allocations DPD would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts from policies to be quantified and monitored in the future.
- 5.10. The report accompanied the Regulation 18 Site Allocations DPD and was subject to consultation. Comments received during the consultation have been considered in preparing this Regulation 19 report. This also builds upon an earlier 'Scoping Report' which set out the baseline and proposed objectives and indicators. In accordance with regulations, this document was subject to a 5-week consultation with statutory environmental bodies and their comments were taken into account when drafting the Regulation 18 Sustainability Appraisal.

Current Sustainability Issues

- 5.11. From the examination of the baseline data and plans, programmes and policies that could influence the Site Allocations DPD it was possible to identify the current sustainability issues faced by the district. These issues are summarised as follows:

Social

- an increasing population, and the need for additional infrastructure⁹ capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- existing school capacity issues will need to be addressed
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged
- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the

⁹ Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open space.

District mostly in relation to access to local community services – this can create social exclusion.

- low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.
- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste. Recycling rates are increasing.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts on traffic and environmental quality. Whilst it is recognised that commuters make a significant financial contribution to the District, it is important that appropriate employment opportunities are promoted within the District to ensure people who live locally can work locally.
- The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained
- There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems.
- The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.

Sustainability Framework – Objectives and Indicators

- 5.12. By taking the above issues it was possible to identify sustainability objectives for the district. These objectives were used to assess how the various policy options (known as 'reasonable alternatives') being explored for the Site Allocations DPD would contribute to the objectives of sustainability. The set of indicators could also be used to devise a monitoring framework for assessing how the policy proposals affect the objectives upon adoption of the Site Allocations DPD.

5.13. A total of 16 Sustainability Objectives were devised:

SOCIAL

- | | |
|----------|---|
| 1 | To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford |
| 2 | To improve the access to health, leisure and open space facilities and reduce inequalities in health. |
| 3 | To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities. |
| 4 | To improve access to retail and community facilities. |
| 5 | To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities. |

ENVIRONMENTAL

- | | |
|-----------|--|
| 6 | To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), thereby minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA) |
| 7 | To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance. |
| 8 | To conserve and enhance the District's biodiversity. (SEA) |
| 9 | To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA) |
| 10 | To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA) |
| 11 | To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA) |
| 12 | To increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal |
| 13 | To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA) |

ECONOMIC

14 To encourage the regeneration and prosperity of the District’s existing Town Centres and support the viability and vitality of village and neighbourhood centres.

15 To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.

16 To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.

Developing and Appraising Options – “Reasonable Alternatives”

5.14. In preparing the Site Allocations DPD, a number of options were considered, and a range of options for each policy area were identified – these are referred to in the guidance as ‘reasonable alternatives’. As the aim of the DPD is to allocate sufficient housing and employment sites in order to meet the identified need, the majority of the Sustainability Appraisal report focuses on the strategy options and site options for allocation. There are also a number of other policies, which have been identified as needed to support the allocation of sites. Reasonable alternatives for these have also been tested through the appraisal process.

5.15. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified.

5.16. The preferred policy option from all of the options appraised has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the ‘preferred option’. In order to record the sustainability of the varying options, a range of colours and symbols has been used:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
?	Uncertain or unknown impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

Table 22: Appraisal Impact scoring method

5.17. All of the reasonable alternatives were appraised using these symbols, against the methodology outlined in section 2 of the main report. Once appraised, mitigation for any predicted negative impacts has been identified.

5.18. The majority of the Site Allocations DPD sites and policies were generally found to impact positively on the social, environmental and economic objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated by one of the policies within the adopted District Plan or could be mitigated by including policy requirements on individual sites.

3. Main Modifications

- 3.1. The Sustainability Appraisal is an iterative process. It is not intended to repeat previous Sustainability Appraisal work and findings within this report as that information is available within the Regulation 18 and regulation 19 (submission) versions of the SA which are within the examination library.
- 3.2. The purpose of this report is to assesses the sustainability implications of the Main Modifications suggested by the Inspector to ensure soundness of the Sites DPD. It is assumed that previous findings are still valid, unless demonstrated otherwise by the exercise undertaken within this report.
- 3.3. The Inspector will take account of the SA and comments received from consultation in producing his final report to the Council.

Main Modifications: Sustainability Appraisal Approach

- 3.4. Many of the proposed changes/modifications to the Sites DPD are minor with regard to significance for the SA process; they are generally concerned with correcting errors, addressing omissions, providing more clarity to policy wording, and updating of information. Therefore, it might be that the Main Modifications have no implications on the findings of the previous (Regulation 19) SA.
- 3.5. The proposed Main Modifications have therefore been screened for their significance with regard to SA – in other words, do the changes, deletions and additions significantly affect the findings of the Submission SA Report and/or do they give rise to significant environmental/sustainability effects?
- 3.6. A pragmatic and proportionate approach was taken, as relevant to this stage of plan-making and assessment. A professional judgment was made for SA significance taking into account the proposed change within the Main Modification and using the same method and SA Framework as the previous SA work, thus providing continuity and consistency of process.

Main Modifications: Conclusion

- 3.7. The results of the screening exercise are set out in **Appendix 1**.
- 3.8. The screening for SA significance identified that most Main Modifications (MMs) do not significantly affect the findings of the previous SA Report (Regulation 19 – Submission: July 2020), nor do they give rise to significant environmental effects.
- 3.9. The requirement for refreshed or new sustainability appraisal of some MMs was identified and the findings are summarised as follows:

- **Main Modification 1: SA25: Land west of Selsfield Road, Ardingly**

This proposed modification reduces the yield from the site from 70 dwellings to 35. This respects the conclusion reached by the Inspector that 70 dwellings in this location would be considered ‘major development’ in the AONB whereas 35 would not.

As the change in yield represents a reasonable alternative option not yet appraised, a new appraisal has been carried out within Appendix 2.

The findings of the revised appraisal find the new option (yield of 35) is likely to have a reduced negative impact on the objective concerned with AONB – Objective 8: Countryside.

- **Main Modification 3: New Policy: Older Persons Accommodation (C2)**

Following the hearing sessions, the Inspector concluded that an additional policy was required on this subject. The new policy would provide support for such uses as long as certain requirements are met.

As this option had not been appraised previously, a new appraisal has been carried out within Appendix 2. The appraisal finds that there are more likely to be positive effects by having such a policy, particularly against the social objectives.

- 3.10. Overall, the results of the screening exercise and additional policy appraisals demonstrate that none of the modifications are likely to alter the original SA findings at Regulation 19/Submission stage (apart from where stated), and where SA findings are altered, they do not give rise to any significant negative environmental impacts. In general, the Main Modifications are more likely to have positive impacts against the SA objectives as a whole by comparison to the results at Regulation 19/Submission stage.

4. Next Steps

- 4.1. Proposed Main Modifications (MMs) have been made to the Site Allocations DPD following examination hearings. These MMs are required to make the Sites DPD sound and capable of adoption. Most changes to the Sites DPD are concerned with correcting errors, addressing omissions, updating, and providing clarity.
- 4.2. As part of the iterative and ongoing SA process, the proposed Main Modifications were screened for their significance with regard to the SA process and any likely significant effects.
- 4.3. The Main Modifications and accompanying evidence, including this SA Report, will be subject to public consultation. Any representations received will be taken into account by the Inspector in his final considerations of the soundness of the Sites DPD. When the Sites DPD is found sound, it will be adopted, and a SA/SEA Adoption Statement will be prepared in accordance with statutory requirements.

Appendix 1 – Screening of Main Modifications: Sustainability Implications

MM Ref	DPD Section	Proposed Change	Does this Main Modification significantly affect the findings of the Submission Sites DPD SA (July 2020) or do they give rise to significant environmental effects?
MM1	Policy SA25, page 73	<p><i>Modify policy SA25: Land West of Selsfield Road, Ardingly, for 70 dwellings, as follows:</i></p> <p>Number of Units: 70 35 dwellings.</p> <p><i>Under Urban Design Principles:</i> <i>New first bullet point:</i></p> <ul style="list-style-type: none"> Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end. <p><i>Amend Policies Map and SA10/SA11 (with figures as at 1st April 2021) to reflect this modification.</i></p>	<p>This site option was appraised at Regulation 18 stage with a yield of 100 dwellings – this gave rise to potential very negative (--) impacts on Objective 9 – “Countryside” due to the sites location within the High Weald AONB and impact on it as the Council concluded that the site was ‘major’ development at this scale.</p> <p>At Regulation 19 stage, the yield reduced to 70 dwellings. The Council concluded that this was not ‘major development’ therefore the impact against Objective 9 was likely to be lower (concluded as negative (-)).</p> <p>The Inspector’s justification for this Main Modification is that a yield of 70 would likely be ‘major’ development. This would therefore re-instate the impact against Objective 9 to very negative (--). The Inspector suggests that a modification that reduces the yield to 35 and amends the site boundary is not likely to be ‘major’.</p> <p>Conclusion: As this is likely to affect the findings of the SA since the Submission version, this policy has been re-appraised in Appendix 2.</p>

<p>MM2</p>	<p>Policy SA20, page 59</p>	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Social and Community:</i> Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.</p> <p><i>The area for the older persons’ dwellings needs to be defined on the Policies Map.</i></p>	<p>Submitted policy SA20 includes the requirement to provide accommodation for older persons (use class C2). The appraisal scored Very Positive (++) against Objective 1 – Housing.</p> <p>This modification simply specifies the amount and location of C2 accommodation within the site boundary.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
<p>MM3</p>	<p>New policy to address the need for specialist accommodation for older people and care homes</p>	<p><i>Include new criteria based policy to provide for specialist accommodation for Older People and Care Homes within Mid Sussex, as follows:</i></p> <p>There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Housing and Economic Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) at 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.</p> <p>Proposals for specialist accommodation for older people and care homes will be supported where: a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood</p>	<p>Further to debate at the hearings in relation to an additional policy for older persons accommodation (Use Class C2), the Inspector has concluded that an additional policy is required in order to address this issue.</p> <p>Conclusion: This is a new policy proposed for inclusion within the SA since the Submission version, reasonable alternatives for this policy have been appraised in Appendix 2.</p>

		<p>Plan; or</p> <p>b) It forms part of a strategic allocation; or</p> <p>c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or</p> <p>d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (policy DP4).</p> <p>In all circumstances, the site must be accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. Proposals must demonstrate how reliance on the private car will be reduced and be 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, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.</p>	
MM4	Policy SA13, page 43	<p><i>Modify policy SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill, for 300 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects responds to the setting of the South Downs National Park in its design, creating <p><i>Under Landscape Considerations:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts on the most visible parts of the site on the wider countryside and the setting of and any potential views 	<p>Submitted policy SA13 already includes requirements related to the setting of the South Downs National Park, the Main Modification proposed gives more clarity to this requirement.</p> <p>The submitted policy also contains the requirement for a Landscape and Visual Impact Assessment to be prepared to support an application inform site layout, capacity and mitigation. During the hearings, an additional piece of work related to Opportunities and Constraints was prepared. The policy wording has been amended to refer to this, and to strengthen the role that the LVIA plays.</p>

		<p>from the South Downs National park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect the dark night skies.</p> <ul style="list-style-type: none"> • The LVIA will incorporate the findings of the Opportunities and Constraints Plan, paying particular attention to the increasing sensitivity moving through the site towards the south, and acknowledge its position as an edge of settlement development to Burgess hill that reflects the characteristics of its immediate area. The design will take account of and respond to the findings of the LVIA. 	<p>Both amendments provide clarity and strengthening to the existing policy but do not materially change the policy in a way that would give alter the findings of the original SA. Similarly, it is not anticipated that any adverse environmental impacts would arise from the change – if anything, more positive impacts could be expected compared to the conclusion reached at Regulation 19 stage.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM5	Policy SA7, page 27	<p><i>Modify policy SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second bullet point:</i> Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM6	Policy SA8, page 28	<p><i>Modify policy SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second Bullet Point:</i> Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p>

		requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.	<p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM7	Policy SA23, page 67	<p><i>Modify policy SA23: Land at Hanlye Lane to the East of Ardingly Road, Cuckfield, for 55 dwellings, as follows:</i></p> <p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Cuckfield, which provides enhanced and accessible open space; respects the character of the village and conserves and enhances the setting of the High Weald AONB;</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the setting of the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM8	Policy SA26, page 76	<p><i>Modify policy SA26: Land South of Hammerwood Road, Ashurst Wood, for 12 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and sits well within conserves and enhances the landscape and scenic beauty of the High Weald AONB <p><i>Under AONB:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to protect conserve and enhance the landscape and scenic beauty of the High Weald AONB. 	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

MM9	Policy SA27, page 78	<p><i>Modify policy SA27: Land at St Martin Close, Handcross, for 35 dwellings, as follows:</i></p> <p><i>Under Objectives, insert new first bullet point:</i> To deliver a high quality, landscape led, sustainable extension to Handcross, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM10	Policy SA28, page 80	<p><i>Modify policy SA28: Land South of The Old Police House, Birchgrove Road, Horsted Keynes, for 25 dwellings, as follows:</i></p> <p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM11	Policy SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the</p>

		<p>landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM12	Policy SA34, page 93	<p><i>Modify policy SA34: Existing Employment Sites</i></p> <p><i>After first paragraph, insert the following text:</i></p> <p>Development proposals outside the traditional employment use classes 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:</p> <ul style="list-style-type: none"> (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. <p>Development proposals outside the traditional employment use classes 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 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.</p>	<p>The Main Modification adds additional requirements in relation to demonstrating continued viable use of the site. If this can not be demonstrated, non-employment generating uses will be supported. This provides some added flexibility.</p> <p>The Submission appraisal concluded that very positive (++) impacts would be expected for the employment objectives 15 – Employment and 16 – Economic Growth.</p> <p>Whilst the main modification could reduce the strength of the policy in protecting existing employment uses, it is not likely to significantly alter the conclusions reached in the original SA.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

<p>MM13</p>	<p>Policy SA35, page 96</p>	<p><i>Modify policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, as follows:</i></p> <p><i>Amend fifth paragraph as follows:</i> New development in these areas should be carefully designed, having regard to matters such as building layout, noise insulation, landscaping, the historic environment, and means of access and meeting the requirement for biodiversity net gain.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal. Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they are only likely to be positive.</p>
<p>MM14</p>	<p>Policy SA37, page 103</p>	<p><i>Modify policy SA37: Burgess Hill/Haywards Heath Multifunctional Network, as follows:</i></p> <p><i>Under third paragraph as follows:</i> The area shown on the Policies Map illustrates where policy SA37 will apply; the precise alignment for the scheme will be informed by detailed design work and it should be carefully designed having a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal. Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they</p>

			are only likely to be positive.
MM15	Appendix B, page 141	<p><i>Modify Appendix B by inserting additional table, as set out below in Appendix 1, after the following text:</i></p> <p>The Council has identified some of the additional information it intends to record if it is available.</p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM16	Housing Trajectory	<p><i>Include the Council's updated housing trajectory within the Plan.</i></p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM17	Policy SA16, page 50	<p><i>Modify policy SA16: St Wilfrid's Catholic Primary School, School Close, Burgess Hill, for 200 dwellings, as follows:</i></p> <p><i>Under Urban Design Principles, at the end of the first bullet point, for 200 dwellings, insert:</i></p> <p>The anticipated yield of the comprehensive redevelopment scheme includes the 200 dwellings proposed in policy SA16, plus an additional 100 dwellings proposed in the Neighbourhood Plan for the Brow Quarter.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM18	Policy SA31, page 50	<p><i>Modify policy SA31: Land to the rear of Firlands, Church Road, Scaynes Hill, for 20 dwellings, as follows:</i></p> <p><i>Under Highways and Access, additional bullet point:</i></p> <p>Contribute towards provision of a footpath connecting the site to the existing footpath to the south. This could be done either as an extension to the Scaynes Hill Common footpath or exploring options for a formal footway alongside the carriageway.</p>	<p>Submitted policy SA31 included a requirement to provide safe and convenient routes for pedestrians and cyclists. The modification strengthens this requirement and details potential options.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p>

			Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM19	SA14, page 46	<p><i>Modify policy SA14: Land to the South of Selby Close, Hammonds Ridge, Burgess Hill, for 12 flats, as follows:</i></p> <p><i>Under Highways and Access, first bullet point:</i> Provide access from Hammonds Ridge. or through CALA Homes development at Edwin Street to the west, the details of which need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM20	SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Highways and Access: Delete first bullet point and insert:</i></p> <ul style="list-style-type: none"> Safe and convenient pedestrian and vehicular access needs to be secured, in accordance with Manual for Streets (MfS) to enable (a) satisfactory access by waste collection vehicles and emergency services vehicles; and (b) safe and convenient pedestrian access, both along Hamsland and into the proposed development. <p><i>Under Biodiversity and Green Infrastructure:</i> Add new bullet point: Ensure adequate protection of the existing trees along the site boundary.</p>	<p>Submitted policy SA29 included a requirement to investigate potential access. The modification strengthens this requirement and provides further details.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM21	SA22, page 65	<p><i>Modify policy SA22: Land North of Burleigh Lane, Crawley Down, for 50 dwellings, as follows:</i></p> <p><i>Under Highways and Access:</i> Provide access from Sycamore Lane or Woodlands Close. Detailed access arrangements will need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p>

			<p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM22	SA20, page 61	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Biodiversity and Green Infrastructure:</i> <i>Additional text at end of bullet point 6: The management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management.</i></p>	<p>This modification adds an additional requirement for monitoring of the SANG, including suggestions for how this could be achieved.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

Appendix 2 – Re-Appraisals / New Appraisals where Main Modifications alter previous SA findings

SA25: Land west of Selsfield Road, Ardingly			
Reasonable Alternatives for Assessment			
<p>A: Land west of Selsfield Road. SHELAA#832. Regulation 19 / Submission stage Units: 70. B: Land west of Selsfield Road. SHELAA#832. Main Modifications stage Units: 35.</p>			
Objective	A – Reg. 19 / Submission	B – Main Modifications	Assessment
1 - Housing	++	++	This site option makes a significant contribution towards the residual housing need and has demonstrated a reasonable prospect of deliverability.
2 - Health	-	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	0	This site option has no areas at risk from flooding, and has not suffered from flooding in the past.
7 - Land Use	-	-	This site option is on green field land.
8 - Biodiversity	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site.
9 - Countryside	--	-	This site is wholly within the High Weald AONB and has been assessed as having a moderate impact upon the landscape due to the scale of development. A previous scheme for 100 units was appraised at Regulation 18 stage as “- -” as it was concluded as ‘major development’ in accordance with NPPF paragraph 177 (and footnote 60). The Regulation 19 SA appraised the impact as negative (‘-’) as the yield had reduced to 70 dwellings and concluded as not major. However, the Sites DPD Inspector has assessed the site as being ‘major’ at this yield, therefore the appraisal now concludes a very negative impact (‘- -’). Option (b), at 35 dwellings, is not concluded as major and therefore a negative impact is expected.
10 - Historic	-	-	This site option has no constraints in terms of listed buildings, but has a less than substantial harm (low) on Ardingly Conservation Area.
11 - Transport	?	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.

12 - Energy/Waste	?	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓		
<p>This site performs relatively well against the SA framework. There is a 'Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact and may be reduced as a result of its reduced scale since originally assessed (Regulation 18 stage: 100 units and Regulation 19 stage: 70 units). As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.</p>			

Older Persons Accommodation			
Reasonable Alternatives for Assessment			
<p>Option (a): To have a policy that supports proposals that will contribute to meeting needs for older people and care homes. This will be supported where allocated, or within the built-up area boundary, or contiguous with the built-up area boundary. The site must be accessible by sustainable modes to local facilities and services, and a travel plan will need to be provided.</p> <p>Option (b): To not have a policy, and therefore rely on District Plan Policy DP30: Housing Mix.</p>			
Objective	A	B	Assessment
1 - Housing	++	+	Both options (a) and (b) are likely to have a positive impact on this objective, as both provide the flexibility to allow for these uses. However, option (a) provides greater clarity by providing explicit support as long as certain requirements are met.
2 - Health	+	0	Option (a) provides support for older persons, particularly those requiring care. This is therefore likely to have a positive impact on health. Option (b) does not preclude this, and provides policy support, however as option (a) provides explicit support it is more likely positive impacts could arise.
3 - Education	0	0	Neither option has an identified impact upon the sustainability objective for education.
4 - Retail	0	0	Neither option has an identified impact upon the sustainability objective for retail.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for communities.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	0	0	Neither option has an identified impact upon the sustainability objective for land use.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	0	0	Neither option has an identified impact upon the sustainability objective for countryside.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for historic environment.
11 - Transport	+	0	Option (a) is stronger in its requirement for the site to be sustainably and accessibly located, and provides certain requirements in relation to travel plans and sustainable transport modes.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	?	?	There may indirect benefits to watercourses by improving air quality in the District.
14 - Regeneration	0	0	Neither option has an identified impact upon the sustainability objective for regeneration.
15 - Employment	0	0	Neither option has an identified impact upon the sustainability objective for employment.

16 - Ec. Growth	0	0	Neither option has an identified impact upon the sustainability objective for economic growth.
Summary of Appraisal:			
Both options (a) and (b) provide support (with caveats) for older persons accommodation. However, as option (a) is more explicit in its support and recognises a need for such accommodation, it is likely that more positive impacts could arise. In particular, social objectives (1) and (2) are likely to receive more positive outcomes with option (a) in place. In addition, option (a) provides certain requirements related to sustainable travel which is not present in DP30: Housing Mix (option (b)) and therefore more positive impacts are expected against this objective.			
Cross-Border Impacts:			
There are no cross-border impacts likely to arise from this policy.			
Recommendations and Mitigation Measures:			
None suggested			
Preferred Option:	A		