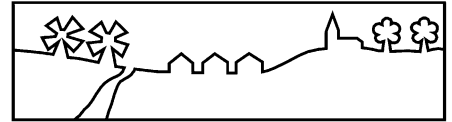


# Appendix E

# Mid Sussex



**MID SUSSEX**  
**DISTRICT COUNCIL**

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”<sup>1</sup>. 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;

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<sup>1</sup> 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 process<sup>2</sup>.

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 <sup>3</sup>	Where Covered in the Sustainability Appraisal Process
<b>a)</b> 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>b)</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”
<b>c)</b> The environmental characteristics of areas likely to be significantly affected	Section 3 – “Context and Baseline” Section 4 – “Identifying Sustainability Issues and Problems”
<b>d)</b> 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”
<b>e)</b> 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”
<b>f)</b> 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)
<b>g)</b> 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
<b>h)</b> 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.
<b>i)</b> A description of measures envisaged concerning monitoring in accordance with Article 10	Appendix 2 “Sustainability Framework Baseline”

<sup>2</sup> National Planning Practice Guidance, Ref: 11-002-20140306

<sup>3</sup> 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

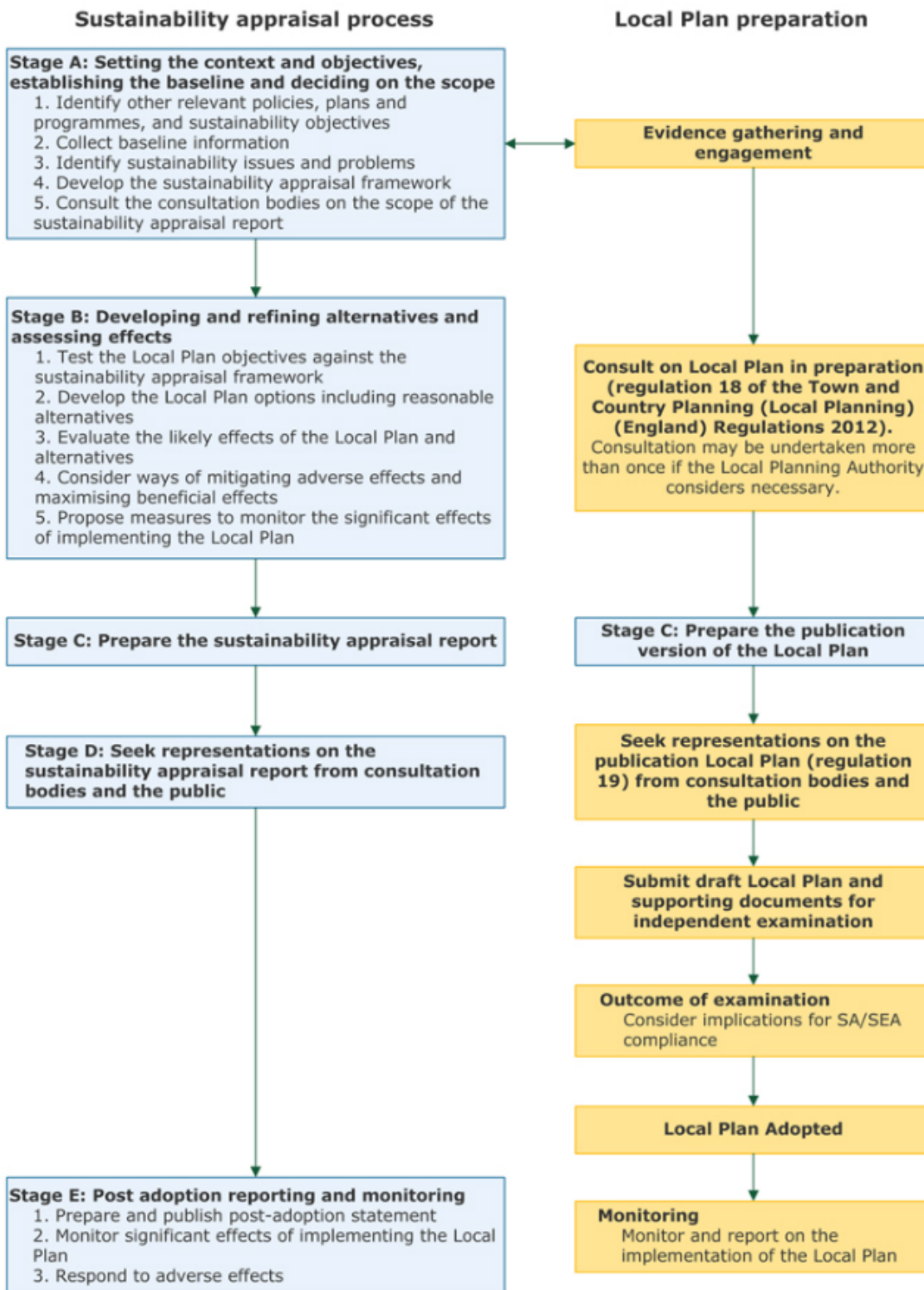
- 2.15. An important part of the Sustainability Appraisal process is consultation with Statutory Environmental Bodies (Historic England, Natural England and the Environment Agency), wider statutory consultees (as defined in the Council’s adopted Statement of Community Involvement) and members of the 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"> <li>- The plan or programme as adopted</li> <li>- A statement summarising how environmental considerations have been integrated into the plan or programme</li> <li>- The measures decided concerning monitoring</li> </ul>	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 Guidance<sup>4</sup>:



**Figure 1 - Stages of the Sustainability Appraisal Process**

<sup>4</sup> "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).

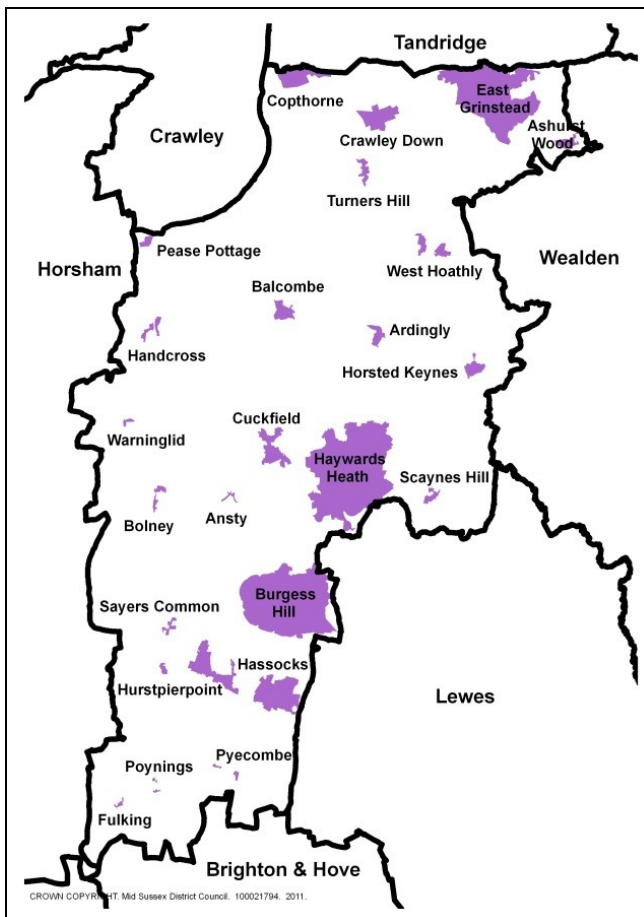


Figure 2 - The Location of Mid Sussex

## Social Baseline

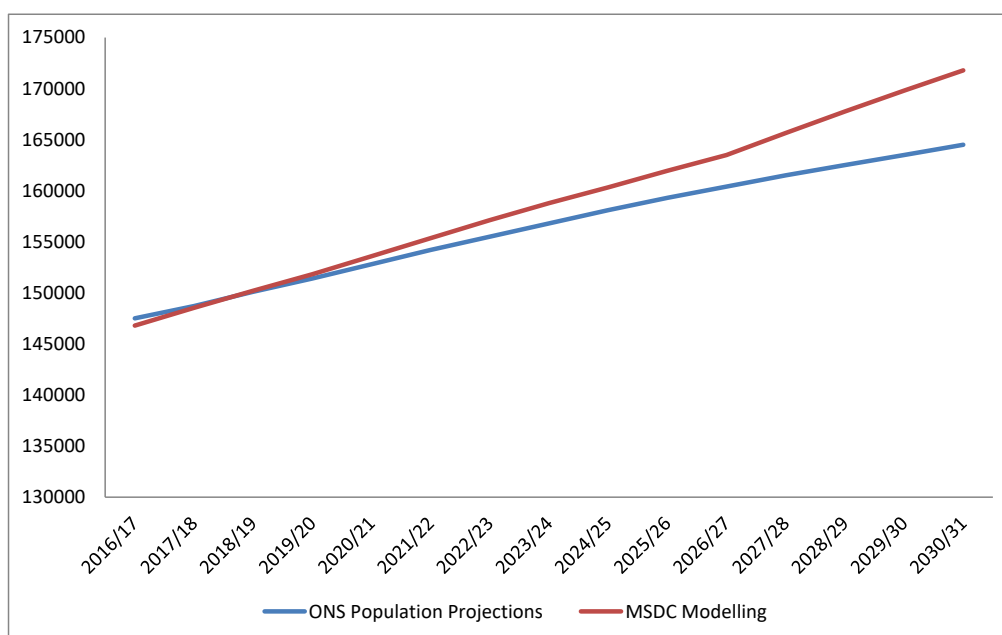
### Human Characteristics

- 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

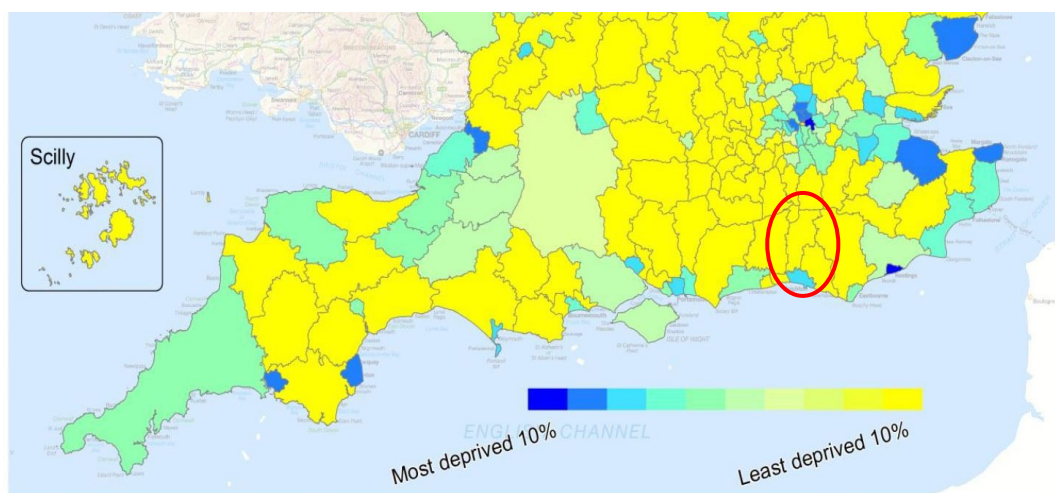
independence and wellbeing. It will also be important to ensure there are suitable employment opportunities to reduce out-migration of residents of working age.

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
<b>Working Age (16-64)</b>	<b>87,867</b>	<b>99,161</b>	<b>12.9</b>	<b>60.9</b>	<b>57.1</b>
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
<b>Older Population (65+)</b>	<b>28,499</b>	<b>42,722</b>	<b>49.9</b>	<b>19.7</b>	<b>24.6</b>
<b>TOTAL POPULATION</b>	<b>144,377</b>	<b>173,739</b>	<b>20.3</b>	<b>100.0</b>	<b>100.0</b>

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.

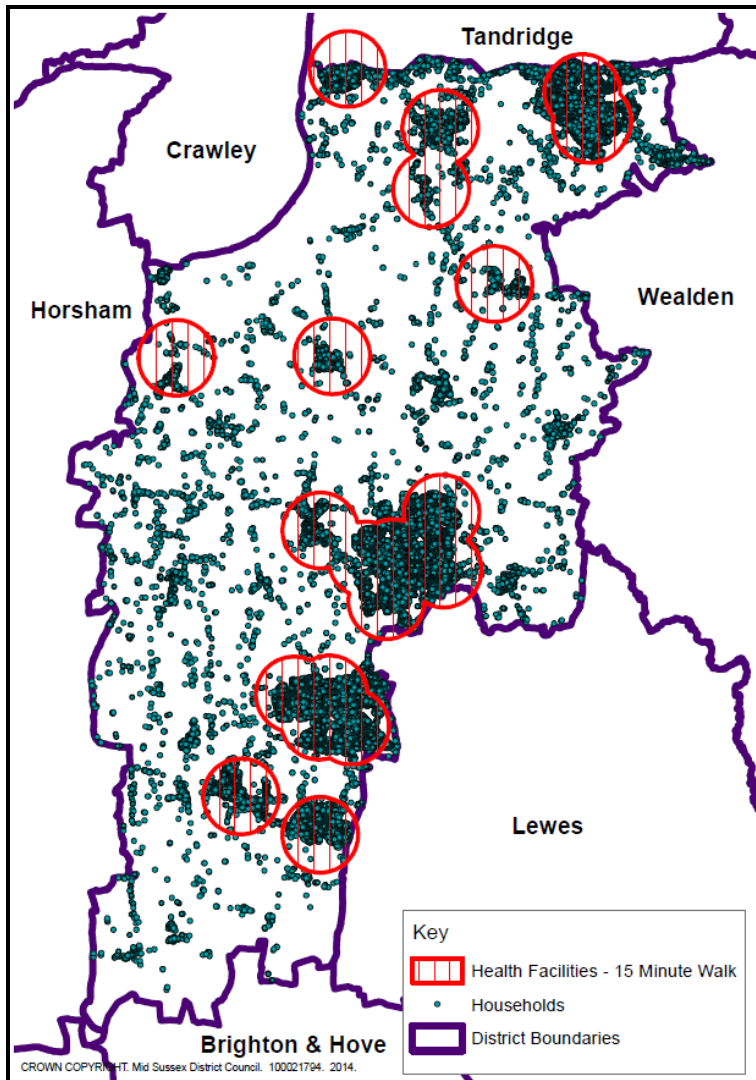


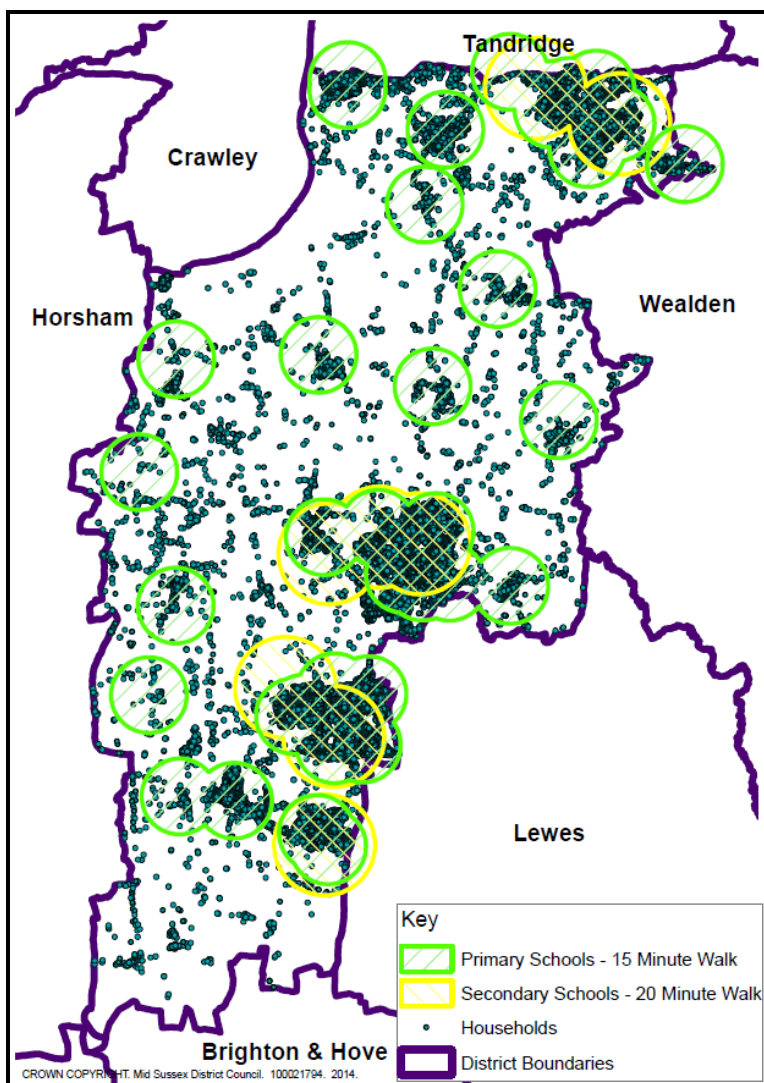
Figure 5 - Access to Health Facilities

### 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, Cophorne, 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**

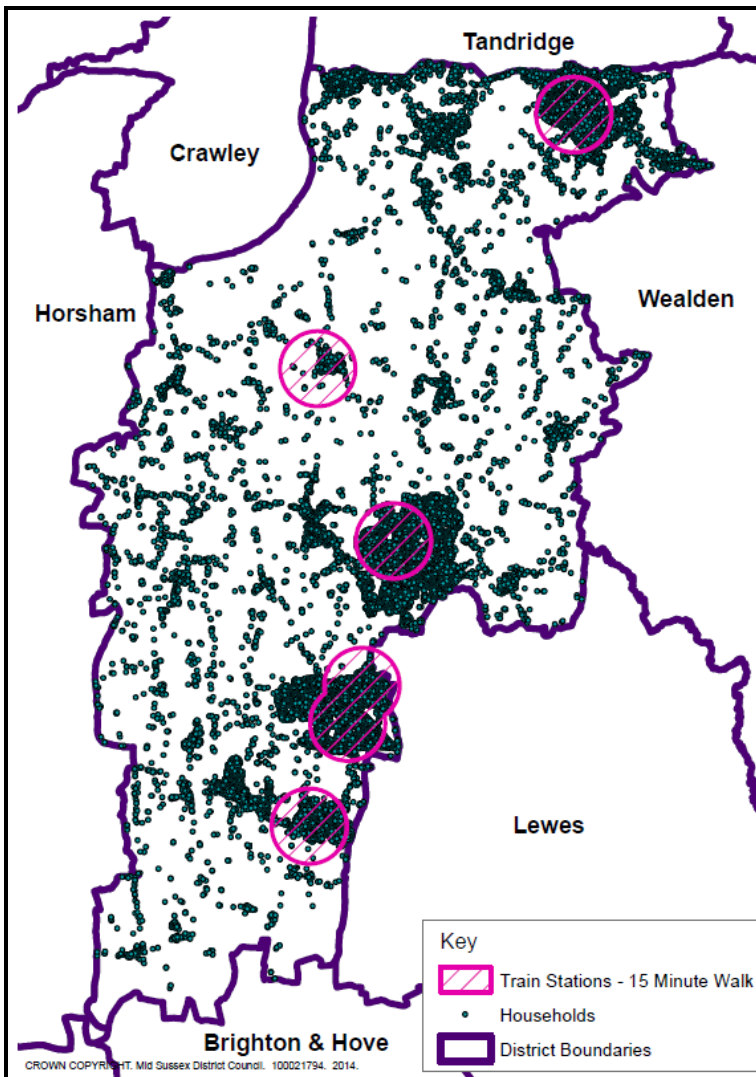
3.38. Mid Sussex District Council has commissioned a refreshed Mid Sussex Transport Model (updating the version used during the District Plan examination). This will assess the transport implications of the Site Allocations DPD. Baseline reporting and site selection implications will be reported in the 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.

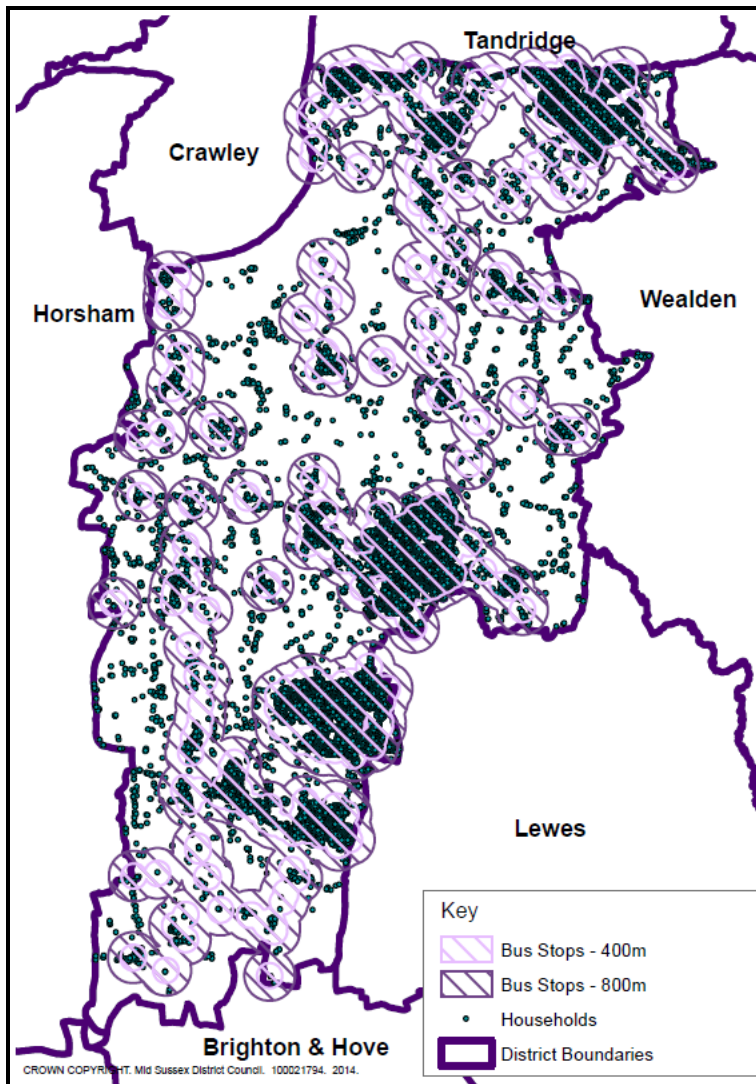
3.42. In terms of access to train stations, 42.1% of the District's households are within a 15 minute walking time (approximately 1.2km) from a train station.



**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.

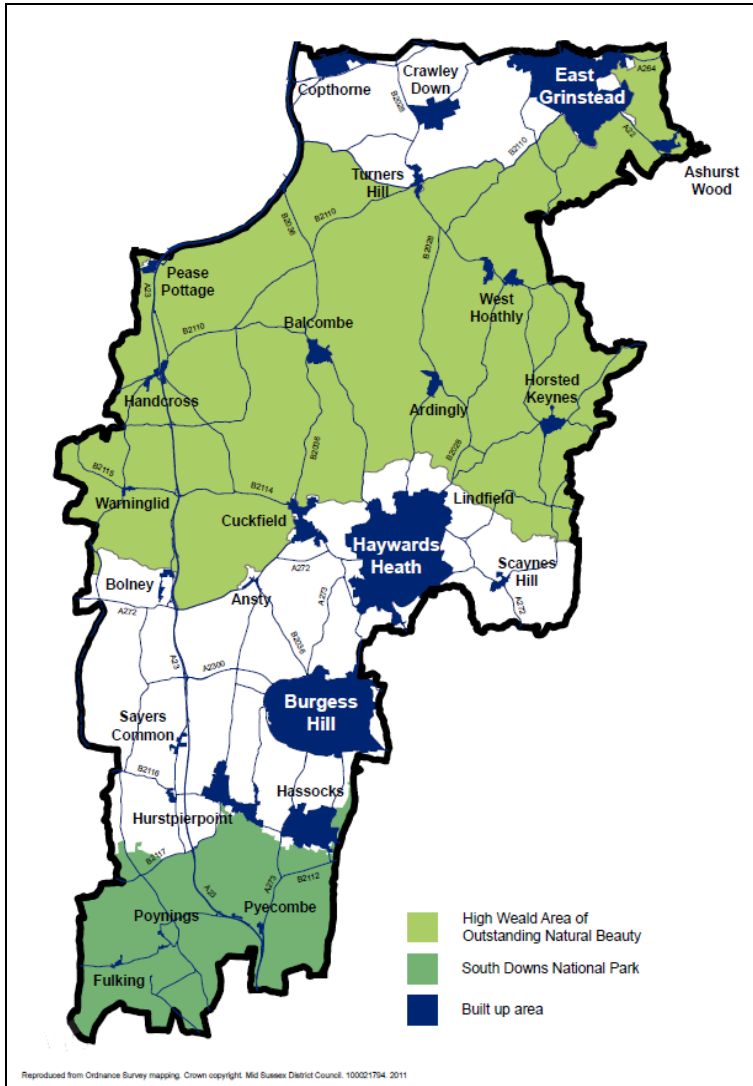
3.46. High vehicle ownership and the potential for highway congestion arising from development present a significant issue. Opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be 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**

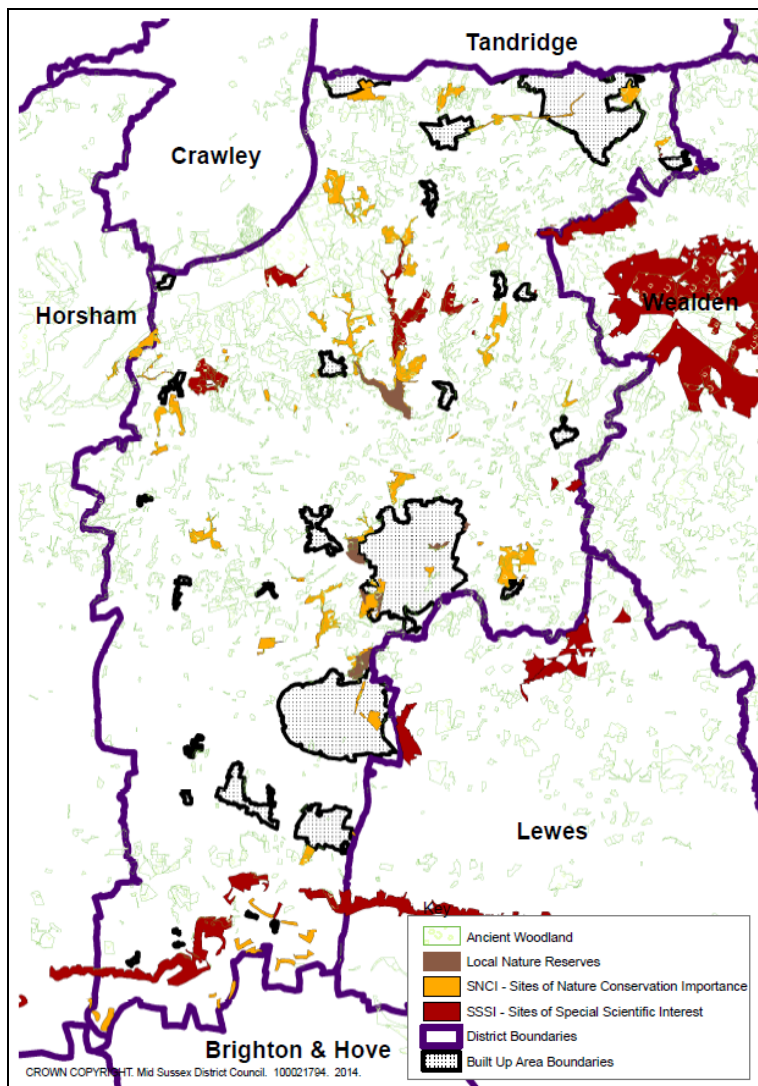
3.49. There are a variety of nature conservation sites within the District (Table 4 and Figure 10) which are important for biodiversity. In 2017/18, 93.8% of Sites of Special Scientific Interest (SSSI) units in Mid Sussex have been found to be in ‘favourable’ or ‘unfavourable but recovering’ condition. 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
<b>SSSI</b>	Site of Special Scientific Interest – a national designation for nature conservation or geological value	13	639.7 Ha	1.9%
<b>SNCI</b>	Site of Nature Conservation Importance – local designation for flora and fauna interest and value	50	1,094 Ha	3.3%
<b>LNR</b>	Local Nature Reserve – local designation for wildlife or geological importance.	6	158 Ha	0.5%
<b>Ancient Woodland</b>	Areas with continuous woodland cover since 1600AD.	1443	5,282 Ha	15.81%

**Table 6** - Nature Conservation Sites in Mid Sussex (Source: MSDC mapping)



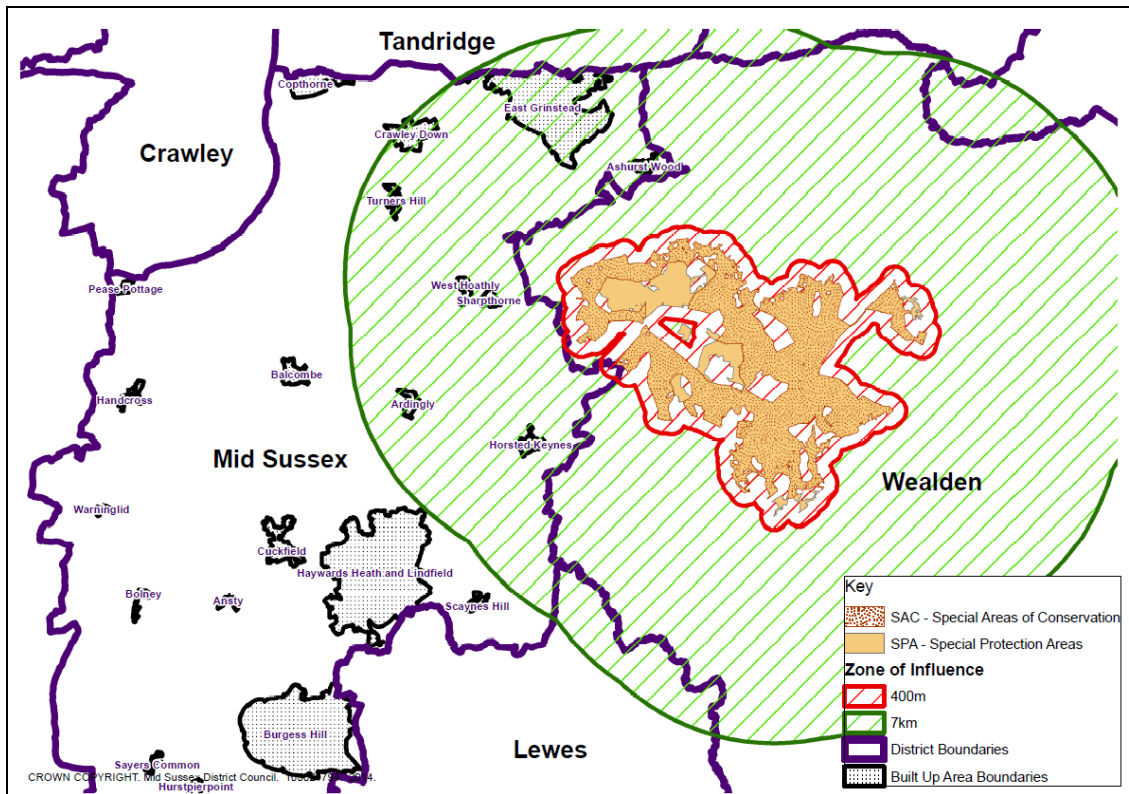
**Figure 10 - Nature Conservation Sites in Mid Sussex**

### 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

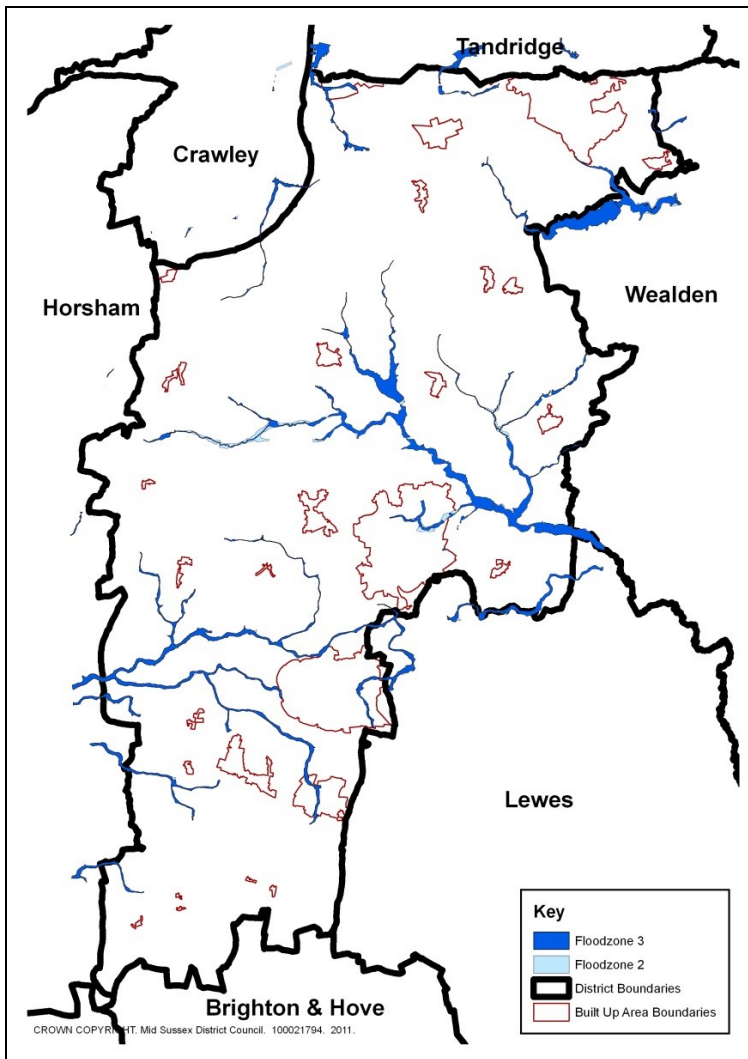
3.63. The District Plan ensures that the District’s historic environment is offered a high level of protection so as not to put any of these important historical assets at risk, in accordance with the National Planning Policy Framework.

### **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 9km<sup>2</sup> of the District (2.7% of the total land area) is at a high risk of flooding (Figure 12). Additionally, approximately 1.6km<sup>2</sup> 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)
<b>Photovoltaics</b>	1,958	17,832
<b>Onshore Wind</b>	5	47
<b>Hydro</b>	0	0
<b>Anaerobic Digestion</b>	0	0
<b>Sewage Gas</b>	1	3,503
<b>Landfill Gas</b>	0	0
<b>Municipal Waste</b>	0	0
<b>Biomass</b>	0	0
<b>Total</b>	<b>1,964</b>	<b>21,382</b>

**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 infrastructure<sup>5</sup> 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.

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<sup>5</sup> 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

<b>1</b>	<p><b>To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford</b></p> <ul style="list-style-type: none"> <li>- <i>housing completions per annum (net)</i></li> <li>- <i>number of affordable homes completed annually (gross)</i></li> <li>- <i>financial contributions towards affordable housing provision</i></li> <li>- <i>number of households accepted as full homeless</i></li> </ul>
<b>2</b>	<p><b>To improve the access to health, leisure and open space facilities and reduce inequalities in health.</b></p> <ul style="list-style-type: none"> <li>- <i>number of applications resulting in new, extended or improved health facilities</i></li> <li>- <i>number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital</i></li> <li>- <i>number of households within 300m of leisure and open space facilities (as defined in the Open Space study)</i></li> </ul>

	<ul style="list-style-type: none"> <li>- <i>financial contributions towards leisure facilities</i></li> <li>- <i>amount of additional community facilities delivered</i></li> </ul>
<b>3</b>	<p><b>To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.</b></p> <ul style="list-style-type: none"> <li>- <i>percentage of population of working age qualified to at least NVQ level 3 (or equivalent)</i></li> <li>- <i>percentage of adults with poor literacy and numeracy skills</i></li> <li>- <i>number of households within a 15 minute walk (approx. 1.2km) from a Primary School</i></li> </ul>
<b>4</b>	<p><b>To improve access to retail and community facilities.</b></p> <ul style="list-style-type: none"> <li>- <i>number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)</i></li> <li>- <i>number of households within a 15 minute walk (approx. 1.2km) from a convenience store</i></li> <li>- <i>number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)</i></li> <li>- <i>number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc)</i></li> </ul>
<b>5</b>	<p><b>To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities.</b></p> <ul style="list-style-type: none"> <li>- <i>all crime – number of crimes per 1000 residents per annum</i></li> <li>- <i>number of domestic burglaries per 1,000 households</i></li> <li>- <i>Number of dwellings permitted more than 150m from a built-up area boundary</i></li> </ul>

## ENVIRONMENTAL

<b>6</b>	<p><b>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)</b></p> <ul style="list-style-type: none"> <li>- <i>percentage of the District that is within Flood Zone 2/Flood Zone 3</i></li> <li>- <i>number of properties at risk from flooding, as defined by the Environment Agency</i></li> <li>- <i>number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds</i></li> </ul>
<b>7</b>	<p><b>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.</b></p> <ul style="list-style-type: none"> <li>- <i>percentage of new and converted homes developed on brownfield land</i></li> <li>- <i>percentage of new employment floorspace on previously developed land</i></li> <li>- <i>average density of new housing developments</i></li> <li>- <i>amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development</i></li> </ul>

<b>8</b>	<p><b>To conserve and enhance the District's biodiversity. (SEA)</b></p> <ul style="list-style-type: none"> <li>- 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</li> <li>- condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC &amp; Ramsar)</li> <li>- number of planning applications approved contrary to advice given by Natural England on biodiversity issues</li> <li>- number of dwellings permitted within the 7km Zone of Influence (SPA)</li> <li>- Capacity of Suitable Alternative Natural Greenspace (SANG)</li> <li>- net gain in biodiversity</li> </ul>
<b>9</b>	<p><b>To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)</b></p> <ul style="list-style-type: none"> <li>- open spaces managed to green flag standard</li> <li>- number of applications approved contrary to advice from the High Weald AONB unit</li> <li>- amount of new development (units) within the High Weald AONB</li> <li>- number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space)</li> <li>- hectares of accessible open space per 1000 population.</li> </ul>
<b>10</b>	<p><b>To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)</b></p> <ul style="list-style-type: none"> <li>- number of Listed Buildings in the District</li> <li>- buildings of Grade I and II* and scheduled monuments at risk</li> <li>- number of Conservation Areas in the District</li> <li>- number of Conservation Areas with appraisals and management proposals</li> </ul>
<b>11</b>	<p><b>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)</b></p> <ul style="list-style-type: none"> <li>- number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)</li> <li>- number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)</li> <li>- number of households within a 15 minute walk (approx. 1.2km) of a train station</li> <li>- proportion of journeys to work by public transport</li> <li>- percentage of residents living and working within Mid Sussex</li> <li>- monetary investment in sustainable transport schemes (value of s.106 agreements)</li> <li>- number of Air Quality Management Areas (AQMA) within the District</li> </ul>
<b>12</b>	<p><b>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</b></p> <ul style="list-style-type: none"> <li>- domestic energy consumption per household</li> <li>- number of renewable energy installations within Mid Sussex</li> <li>- installed capacity of renewable energy installations within Mid Sussex</li> <li>- percentage of domestic waste that has been recycled</li> </ul>

<b>13</b>	<b>To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)</b>
	<ul style="list-style-type: none"> <li>- Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"</li> <li>- Stretches of watercourse with no deterioration in Water Framework Directive status</li> <li>- incidents of major and significant water pollution within the District</li> <li>- number of planning applications approved contrary to advice given by the EA on water quality issues</li> </ul>

## ECONOMIC

<b>14</b>	<b>To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.</b>
	<ul style="list-style-type: none"> <li>- Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)</li> <li>- number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)</li> </ul>

<b>15</b>	<b>To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.</b>
	<ul style="list-style-type: none"> <li>- percentage of Mid Sussex residents who are employed</li> <li>- percentage of Mid Sussex residents who are economically active</li> <li>- average weekly income (gross) for those who are employed in the District</li> <li>- percentage of residents living and working within Mid Sussex</li> <li>- job density (ratio of jobs to working age population)</li> </ul>

<b>16</b>	<b>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.</b>
	<ul style="list-style-type: none"> <li>- net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace</li> <li>- number of businesses within the District</li> <li>- number of new businesses setting up in the District</li> </ul>

## Compatibility of Sustainability Objectives

5.7. In reality, it is a difficult balancing act for all policies within the plan to satisfy Social, Environmental and Economic sustainability aims all at once. Prior to appraising the strategy and policies within the consultation draft Site Allocations DPD, the 18 Sustainability objectives have been tested for compatibility with one another. This exercise helps to identify where there may be possible conflicts between the objectives themselves. In concluding the overall sustainability of the policies within the plan, the conflicts between the different sustainability objectives should be borne in mind.

2 - Health	✓																	
3 - Education																		
4 - Retail		✓																
5 - Crime	✓		✓	✓														
6 - Flood Risk	x																	
7 - Land Use	✓						✓											
8 - Biodiversity	x																	
9 - Countryside	x			✓		✓	✓	✓										
10 - Historic				✓			x	✓	✓									
11 - Transport	x	✓		✓			✓	✓										
12 - Energy/Waste	x						✓	✓		✓								
13 - Water	x					✓	✓	✓	✓			✓						
14 - Regeneration	✓			✓	✓		✓				x	✓						
15 - Employment	✓		✓		✓	x		x	x									✓
16 - Ec. Growth	✓		✓	✓	✓	x		x	x									✓
		1 - Housing	2 - Health	3 - Education	4 - Retail	5 - Crime	6 - Flood Risk	7 - Land Use	8 - Biodiversity	9 - Countryside	10 - Historic	11 - Transport	12 - Energy/Waste	13 - Water	14 - Regeneration	15 - Employment		

✓	Compatible
	No Link
x	Incompatible

**Table 8 - Compatibility of Sustainability Appraisal Objectives**

5.8. It is evident that most of the objectives are compatible with each other or have no link/neutral impact. Cases where objectives are not compatible with one another were where objectives that result in the need for growth/development are compared against those concerned with conserving and enhancing the environment – i.e. the need for development to be minimised (for example, the conflict between objective 1 and objectives 8-13).

5.9. It will be important that, when selecting sites for allocation, the full range of constraints and sustainability objectives are taken into account to ensure the most suitable sites are selected, whilst bearing in mind the NPPF presumption in favour of sustainable development and substantial weight to be applied to meeting housing need. In appraising the various sites and policies within the Site Allocations DPD, it is likely that conflicts between conserving the environment and providing housing and employment will arise. It will be the job of the appraisal to identify where conflicts occur, minimise adverse impacts by promoting the most suitable policy options, and identify mitigation where adverse impacts cannot be avoided (for example precise policy wording and/or mitigation requirements).

## Identification of Reasonable Alternatives and Appraisals

5.10. In preparing the Site Allocations DPD, a number of options were considered, and a range of options for each policy area were identified. As the aim of the DPD is to allocate sufficient housing and employment sites in order to meet the identified need, the majority of this



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 1<sup>st</sup> April 2017) was:

<b>District Plan Minimum Requirement</b>	<b>16,390</b>
<b>Completions (2014/15 - 2016/17)</b>	2,410
<b>Total Housing Commitments (inc. strategic developments already with permission)</b>	7,091
<b>Strategic Development – Northern Arc, Burgess Hill</b>	3,500
<b>Strategic Development – Land north of Clayton Mills, Hassocks</b>	500
<b>Windfall Allowance</b>	450
<b>Elsewhere in the district, as allocated through future Neighbourhood Plans and the Site Allocations DPD</b>	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:

<b>District Plan Minimum Requirement</b>	<b>16,390</b>
<b>Completions (2014/15 - 2019/20)</b>	4,917
<b>Total Housing Commitments (inc. strategic developments already with permission)</b>	9,689
<b>Windfall Allowance</b>	504
<b>Elsewhere in the district, as allocated through future Neighbourhood Plans and the Site Allocations DPD</b>	<b>1,280</b>

**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.

<b>Settlement Category</b>	<b>Settlements</b>	<b>Minimum Residual</b>
<b>1 – Town</b>	Burgess Hill, East Grinstead, Haywards Heath	706
<b>2 – Larger Village</b>	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint, Lindfield	198
<b>3 – Medium Sized Village</b>	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly	371
<b>4 – Smaller Village</b>	Ansty, Staplefield, Slaugham, Twineham, Warninglid	5
<b>5 – Small Settlement</b>	Birch Grove, Brook Street, Hickstead, Highbrook, Walstead	N/A
<b>Total</b>		<b>1,280</b>

**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
	<b>TOTAL</b>	<b>1,280</b>

**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

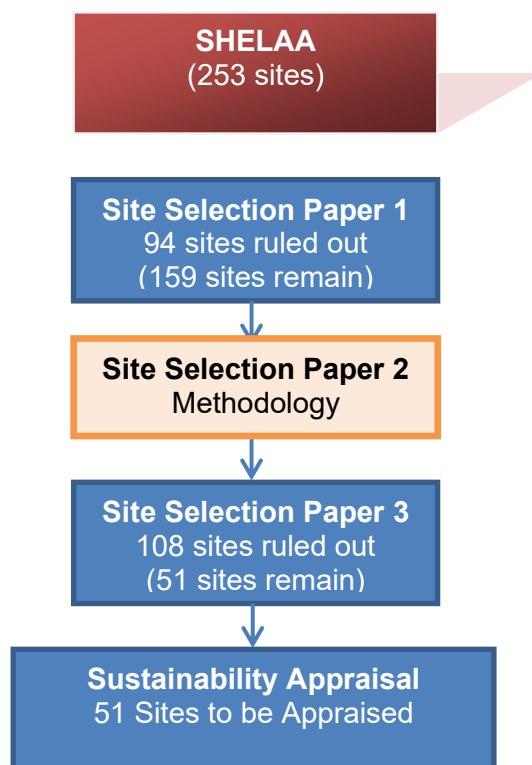


Figure 13 - Site Selection Process

- 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
	<b>TOTAL</b>	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:

<b>Sites That Perform Well</b>	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.
<b>Sites That Perform Poorly</b>	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).
<b>Marginal</b>	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.

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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 <sup>6</sup>	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

<sup>6</sup> 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.

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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	<b>65<sup>7</sup></b>	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	<b>30</b>	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	<b>25</b>	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	<b>35</b>	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	<b>20</b>	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

<sup>7</sup> 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.



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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

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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

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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

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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	<b>45</b>	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			
<b>Total: 20 sites</b>		<b>1,507</b>	<b>1,424</b>	<b>144</b>			

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"> <li>Land at Ansty Farm, Land north of The Lizard, Cuckfield Road, Ansty (75 units)</li> <li>Challoners, Cuckfield Road, Ansty (10 units)</li> <li>Extension to allocated Land at Bolney Road, Ansty (45 units)</li> </ul>	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"> <li>Land to the west of Kings Business Centre, Reeds Lane, Sayers Common (100 units)</li> </ul>	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"> <li>Land opposite Stanford Avenue, London Road, Hassocks (45 units)</li> <li>Land west of Kemps, Hurstpierpoint (114 units)</li> <li>Land east of College Lane, Hurstpierpoint (165 units)</li> </ul>	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"> <li>Land south of Folders Lane and east of Keymer Road, Burgess Hill (200 units)</li> <li>Land east of Greenacres, Keymer Road and south of Folders Lane (100 units)</li> <li>Land South of 96 Folders Lane, Burgess Hill (40 units)</li> </ul>	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"> <li>• Old Court House, Blackwell Hollow, East Grinstead (12 units)</li> <li>• Haywards Heath Golf Course, High Beech Lane, Haywards Heath (630 units)</li> </ul>	<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)
<b>A</b>	20 'Constant Sites'	1,424	+144
<b>B</b>	20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites)	1,764	+484
<b>C</b>	20 'Constant Sites' + Haywards Heath Golf Course	2,054	+774

Table 19 - Housing Options

Site Selection				
Reasonable Alternatives for Assessment				
<p><b>Option A:</b> 20 'Constant Sites'. <b>1,424 dwellings.</b></p> <p><b>Option B:</b> 20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites). <b>1,764 dwellings</b></p> <p><b>Option C:</b> 20 'Constant Sites' + Haywards Heath Golf Course. <b>2,054 dwellings.</b></p>				
Objective	A	B	C	Assessment
1 - Housing	+	++	++	All options meet the residual housing requirement, therefore impact positively on this objective. Options (b) and (c) provide more certainty that housing need would be met, as they provide a healthy buffer above the minimum amount of development required. This provides a level of contingency should some sites not be delivered as expected (either in entirety, or with a reduced yield).
2 - Health	+	++	+	The 20 constant sites have been selected according to their consistency with the spatial strategy, focusing on higher tier settlements. The collection of sites is largely well connected to health, education and retail facilities. Option (b) performs more positively against these objectives, as the sites at Folders Lane are in close proximity to each of these facilities.
3 - Education	+	++	+	
4 - Retail	+	++	+	
5 - Communities	+	+	+	All options would provide sufficient housing, spread across the district according to the settlement hierarchy and District Plan strategy. This enables families to grow in areas where need is derived from, helping existing communities to grow.
6 - Flood Risk	0	0	0	None of the options are likely to have any negative impacts on flood risk. All sites selected will need to ensure there is no risk from flooding.
7 - Land Use	-	-	--	All options would involve significant development on greenfield sites, and are therefore likely to have negative impacts on this objective. In particular, the yield associated with option (c) is likely to have a greater impact on this objective.
8 - Biodiversity	?	?	-	Options (a) and (b) include sites that may have a negative impact on biodiversity, although policy requirements for mitigation should reduce any negative impacts. Option (c) in particular includes a site that contains ancient woodland and is adjacent to a designated Local Wildlife Site; although these could be mitigated there is a higher prospect of negative impacts upon this objective.
9 - Countryside	-	-	-	Whilst some sites have a greater impact on landscape

				and designated areas (AONB) than others, each have been assessed as having ‘low impact’ overall. There are no significant differences between the three options on this objective.
10 - Historic	?	?	?	There are no negative impacts expected from any of the three options.
11 - Transport	?	?	?	There are no ‘severe’ highways impacts expected from any of the three options. Policy requirements could ensure access or highways mitigation is provided to ensure no severe impacts arise.
12 - Energy/Waste	-	-	-	All options will increase the amount of waste generated, albeit that sustainable construction techniques can be utilised and waste recycling will be employed to minimise any impacts. There are no significant differences between the three options.
13 - Water	-	-	-	All options will increase demand on water supply and for wastewater treatment. There are no significant differences between the three options.
14 - Regeneration	+	++	+	Option <b>(b)</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>(b)</b> and <b>(c)</b> ) within the district will have positive knock-on effects for local businesses, retail, and entertainment and community facilities, supporting economic growth.
<b>Summary of Appraisal:</b>				
<p>All three options would meet the residual housing need; therefore perform positively in relation to the housing objective. Options <b>(b)</b> and <b>(c)</b> 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>(b)</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 <b>(c)</b>) 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 <b>(c)</b> 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>(b)</b> and <b>(c)</b> are more likely to have positive impacts on economic growth objectives due to their higher yield than option <b>(a)</b>.</p>				
<b>Cross-Border Impacts:</b>				

<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><b>Recommendations and Mitigation Measures:</b></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><b>Preferred Option:</b></p>	<p><b>B</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).

<b>Employment - Strategy</b>				
<b>Reasonable Alternatives for Assessment</b>				
<b>Option A:</b> Allocate sufficient 'new' employment sites to meet the 10-15ha				
<b>Option B:</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				
<b>Option C:</b> '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).				
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>Assessment</b>
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>(b)</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 <b>(a)</b> 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>(b)</b> as it relies on windfall, which by its nature is uncertain in terms of size and timing of delivery. Option <b>(c)</b> 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 <b>(a)</b> 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>(b)</b> as it relies on windfall, which by its nature is uncertain in terms of size and timing of delivery. Option <b>(c)</b> 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).
<b>Summary of Appraisal:</b>				
<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 <b>(a)</b>. 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>(b)</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 <b>(c)</b> 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>				
<b>Cross-Border Impacts:</b>				
None expected.				
<b>Recommendations and Mitigation Measures:</b>				
Additional sites should contain criteria to ensure minimised impacts on landscape, countryside and biodiversity.				
<b>Preferred Option:</b>	<b>A</b>			

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

<b>'At Bolney Grange'</b>	<b>'A2300 Vicinity'</b>	<b>'Other'</b>
<b>24</b> - Land at Stairbridge Lane (South of Bolney Grange), Bolney (5.5ha)	<b>602</b> - Land at Northlands Farm, A2300/A23, Hickstead (7.25ha)	<b>192</b> - Pease Pottage Nurseries, Brighton Road, Pease Pottage (1ha)
<b>906</b> - Undeveloped land (south) at Bolney Grange Business Park, Stairbridge Lane, Bolney (0.6ha)	<b>946</b> - Northlands Farm, Stairbridge Lane, Bolney (14.5ha)	<b>665</b> - Hangerwood Farm, Foxhole Lane, Bolney (9.2ha)
<b>907</b> - Undeveloped land (east) at Bolney Grange Business Park, Stairbridge Lane, Bolney (0.2ha)	<b>947</b> - Land between A2300 and Jobs Lane, Bolney (2.04ha)	<b>826</b> - Burnside Centre, Victoria Road, Burgess Hill (0.96ha)
<b>931</b> - Extension (east) to Bolney Grange Business Park, Stairbridge Lane, Bolney (0.7ha)	<b>948</b> - Land south of A2300 adjacent to Pookbourne Lane (10ha)	<b>864</b> - Marylands Nursery, Cowfold Road, Bolney (2.4ha)
		<b>865</b> - Bolney Nursery, Cowfold Road, Bolney (0.8ha)
		<b>888</b> - Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage (2.3ha)
		<b>912</b> - Site of Former KDG, Victoria Road, Burgess Hill (1.1ha)
		<b>913</b> - The Walled Garden, behind the Scout Hut, London Road, Balcombe (0.3ha)
		<b>915</b> - Area south of

		Redbridge Lane at junction with London Road, Balcombe (1.2ha)
		<b>940</b> - Land north of the A264 at Junction 10 of M23 (Employment Area) (2.7ha)
		<b>991</b> - Extension to Silverwood, Copthorne (10-15ha)
		<b>994</b> - Friday Farm, Copthorne (2.08ha)
		<b>996</b> - Extension to Barn Court, Copthorne (3.73ha)
		<b>999</b> - Additional employment land north of A264 Copthorne (3.5ha)
		<b>1005</b> – Land at Hazeldene Farm, north of Orchard Way, Warninglid (2.9ha)
		<b>1007</b> – 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.

<b>Employment – Broad Spatial Options</b>				
<b>Reasonable Alternatives for Assessment</b>				
<b>Option A:</b> Small extensions at Bolney Grange				
<b>Option B:</b> Large sites in the vicinity of the A2300, Burgess Hill				
<b>Option C:</b> 'Other' smaller sites spread across the district				
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>Assessment</b>
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:**

Options (a) and (c) perform positively against the social and economic objectives as they would encourage existing business to grow as well as encouraging new business use across the district.

Whilst option (b) would also encourage new business to the district, this is located in one area (on the edge of Burgess Hill) and would not provide well-needed employment land in other locations – noting that the District Plan strategy involves housing growth at nearly all settlements within the district according to the settlement hierarchy (District Plan policies DP4/DP6) and employment opportunities should be provided to match, where possible.

In particular, the location of the sites within option (b) are likely to have negative impacts on the transport objective due to their proximity to the already adopted strategic site (Northern Arc), location for a Science and Technology Park and significant employment allocation in the District Plan (The Hub, currently under construction).

**Cross-Border Impacts:**

None expected.	
<b>Recommendations and Mitigation Measures:</b>	
Additional sites should contain criteria to ensure minimised impacts on landscape, countryside and biodiversity.	
<b>Preferred Option:</b>	<b>A / C</b>

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**

<b>Employment Sites</b>																	
<b>Reasonable Alternatives for Assessment</b>																	
<p><b>A</b> - Pease Pottage Nurseries, Brighton Road, Pease Pottage (1ha) <i>SHELAA# 192</i>  <b>B</b> - Hangerwood Farm, Foxhole Lane, Bolney (9.2ha) <i>SHELAA# 665</i>  <b>C</b> - Burnside Centre, Victoria Road, Burgess Hill (0.96ha) <i>SHELAA# 826</i>  <b>D</b> - Marylands Nursery, Cowfold Road, Bolney (2.4ha) <i>SHELAA# 864</i>  <b>E</b> - Bolney Nursery, Cowfold Road, Bolney (0.8ha) <i>SHELAA# 865</i>  <b>F</b> - Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage (2.3ha) <i>SHELAA# 888</i>  <b>G</b> - Site of Former KDG, Victoria Road, Burgess Hill (1.1ha) <i>SHELAA# 912</i>  <b>H</b> - The Walled Garden, behind the Scout Hut, London Road, Balcombe (0.3ha) <i>SHELAA# 913</i>  <b>I</b> - Area south of Redbridge Lane at junction with London Road, Balcombe (1.2ha) <i>SHELAA# 915</i>  <b>J</b> - Land north of the A264 at Junction 10 of M23 (Employment Area) (2.7ha) <i>SHELAA# 940</i>  <b>K</b> - Extension to Silverwood, Copthorne (1ha) <i>SHELAA# 991</i>  <b>L</b> - Friday Farm, Copthorne (2.08ha) <i>SHELAA# 994</i>  <b>M</b> - Extension to Barn Court, Copthorne (3.73ha) <i>SHELAA# 996</i>  <b>N</b> - Additional employment land north of A264 Copthorne (3.5ha) <i>SHELAA# 999</i>  <b>O</b> - Land at Hazeldene Farm, north of Orchard Way, Warninglid (5.44ha) <i>SHELAA# 1005</i>  <b>P</b> - Crawley Down Garage (2.9ha) <i>SHELAA# 1007</i></p>																	
<b>Objective</b>	<b>A – PP Nurseries</b>	<b>B – Hangerwood</b>	<b>C – Burnside</b>	<b>D – Marylands</b>	<b>E – Bolney Nursery</b>	<b>F – Cedars</b>	<b>G – Former KDG</b>	<b>H – Walled Garden</b>	<b>I – Redbridge</b>	<b>J – A264 J10</b>	<b>K – Silverwood</b>	<b>L – Friday Farm</b>	<b>M – Barn Court</b>	<b>N – N of A264</b>	<b>O – Hazled Farm</b>	<b>P – C.D. Garage</b>	<b>Assessment</b>
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



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																	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

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																	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.

<b>Science and Technology Park – Site Options</b>			
<b>Reasonable Alternatives for Assessment</b>			
<b>Option A:</b> SHELAA #949 “Land to the north of A2300”			
<b>Option B:</b> SHELAA #801 “Land at Dumbrell’s Farm, south of the A2300”			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
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.
<b>Summary of Appraisal:</b>			
<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>			
<b>Cross-Border Impacts:</b>			
None expected.			

<b>Recommendations and Mitigation Measures:</b>	
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.	
<b>Preferred Option:</b>	<b>A</b>

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

<b>Existing Employment Sites</b>			
<b>Reasonable Alternatives for Assessment</b>			
<b>Option (a):</b> To have a policy that supplements District Plan Policy <b>DP1: Sustainable Economic Development</b> by providing additional policy requirements relating to the protection of existing employment sites, whilst supporting their expansion where appropriate.			
<b>Option (b):</b> To not have this policy, and therefore rely on District Plan Policy <b>DP1: Sustainable Economic Development</b> .			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
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 <b>(a)</b> goes further than Option <b>(b)</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 <b>(a)</b> goes further than Option <b>(b)</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 <b>(a)</b> goes further than Option <b>(b)</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.
<b>Summary of Appraisal:</b>			
<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 <b>(a)</b>), 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 <b>(a)</b> explains the greater number of significantly positive scores in comparison to option <b>(b)</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>			
<b>Cross-Border Impacts:</b>			

There are no cross-border impacts likely to arise from this policy.	
<b>Recommendations and Mitigation Measures:</b>	
Option (a) should include sufficient mitigation for site expansion in the countryside.	
<b>Preferred Option:</b>	<b>A</b>

## 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.

<b>10 - Historic</b>	<b>0</b>	<b>0</b>	Neither option has an identified impact upon the sustainability objective for the historic environment.
<b>11 - Transport</b>	<b>++</b>	<b>+</b>	Both options have a positive impact on the sustainability objective for transport. Option <b>(a)</b> is more positive because it provides policy support for particular transport schemes.
<b>12 - Energy/Waste</b>	<b>0</b>	<b>0</b>	Neither option has an identified impact upon the sustainability objective for energy/waste.
<b>13 - Water</b>	<b>0</b>	<b>0</b>	Neither option has an identified impact upon the sustainability objective for water.
<b>14 - Regeneration</b>	<b>++</b>	<b>+</b>	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 <b>(a)</b> is more positive because it provides policy support for particular transport schemes.
<b>15 - Employment</b>	<b>++</b>	<b>+</b>	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 <b>(a)</b> is more positive because it provides policy support for particular transport schemes.
<b>16 - Ec. Growth</b>	<b>++</b>	<b>+</b>	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 <b>(a)</b> 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.

<b>Option (b):</b> To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
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.
<b>Summary of Appraisal:</b>			
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>(b)</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 <b>(a)</b>), 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 <b>(a)</b> explains the greater number of positive impacts in comparison to option <b>(b)</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>	
<b>Cross-Border Impacts:</b>	
There are no cross-border impacts likely to arise from this policy.	
<b>Recommendations and Mitigation Measures:</b>	
None suggested.	
<b>Preferred Option:</b>	<b>A</b>

<b>Burgess Hill / Haywards Heath Multifunctional Network</b>			
<b>Reasonable Alternatives for Assessment</b>			
<p><b>Option (a):</b> 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><b>Option (b):</b> To not have this policy, and therefore rely upon other existing Development Plan policies and the NPPF.</p>			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
1 - Housing	+	0	Option <b>(a)</b> 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 <b>(a)</b> 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 <b>(a)</b> 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 <b>(a)</b> 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 <b>(a)</b> 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>(b)</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.
<b>Summary of Appraisal:</b>			
<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>			
<b>Cross-Border Impacts:</b>			
There are no cross-border impacts likely to arise from this policy.			
<b>Recommendations and Mitigation Measures:</b>			
None suggested.			
<b>Preferred Option:</b>	<b>A</b>		



<b>Air Quality</b>			
<b>Reasonable Alternatives for Assessment</b>			
<p><b>Option (a):</b> To have a policy that supplements <b>District Plan Policy DP29: Noise, Air and Light Pollution</b> 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><b>Option (b):</b> To not have this policy, and therefore rely on District Plan Policy <b>DP29: Noise, Air and Light Pollution</b>.</p>			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
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.
<b>15 - Employment</b>	<b>0</b>	<b>0</b>	Neither option has an identified impact upon the sustainability objective for employment.
<b>16 - Ec. Growth</b>	<b>0</b>	<b>0</b>	Neither option has an identified impact upon the sustainability objective for economic growth.
<b>Summary of Appraisal:</b>			
<p>In protecting residents' quality of life from unacceptable levels air pollution, option <b>(a)</b> and <b>(b)</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 <b>(a)</b> provides a more robust policy framework than option <b>(b)</b> to ensure that any negative impact of new development on air quality is minimised and appropriately mitigated when necessary.</p>			
<b>Cross-Border Impacts:</b>			
The positive impacts to air quality will have a positive cross-boundary, particularly the Ashdown Forest.			
<b>Recommendations and Mitigation Measures:</b>			
None suggested			
<b>Preferred Option:</b>	<b>A</b>		

## 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



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
<b>International</b>		
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.
<b>National</b>		
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 <sup>th</sup> November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
<b>Local</b>		
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
<b>National</b>		
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 <sup>th</sup> November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
<b>Local</b>		
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
<b>International</b>		
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
<b>National</b>		
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.
<b>Regional/ County</b>		
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.
<b>Local</b>		
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
<b>National</b>		
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 <sup>th</sup> November 2011.	
<b>Local</b>		
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"> <li>• To establish the vitality and viability of the retail centres in the District; and</li> <li>• To provide a robust assessment of current and projected retail needs for the period to 2026.</li> </ul>	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
<b>National</b>		
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 <sup>th</sup> November 2011.	The Site Allocations DPD must ensure Neighbourhood Plans are accounted for.
<b>Local</b>		
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
<b>International</b>		
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.

<b>1</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford</b>	<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
<b>2</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To improve the access to health, leisure and open space facilities and reduce inequalities in health.</b>	<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
<b>3</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To maintain and improve the opportunities for everyone to acquire the skills needed</b>	<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)

<b>to find and remain in work and improve access to educational facilities.</b>	<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

<b>4</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To improve access to retail and community facilities.</b>	<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

<b>5</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities.</b>	<i>All crime – number of crimes per 1000 residents per annum</i>	<b>2013/14:</b> 34.41 per 1,000 residents	Sussex Police
	<i>Number of domestic burglaries per 1,000 households</i>	<b>2013/14:</b> 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

<b>6</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>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)</b>	<i>Percentage of the District that is within Flood Zone 2/Flood Zone 3</i>	<b>FZ2:</b> 3.2% <b>FZ3:</b> 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

<b>7</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>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.</b>	<i>Percentage of new and converted homes developed on brownfield land</i>	2016/17: 52.5%	MSDC Monitoring 2018
	<i>Percentage of new employment floorspace on previously developed land</i>	Not Currently Monitored	To be monitored 2018/19
	<i>Density of new housing developments</i>	Not Currently Monitored	To be monitored 2018/19
	<i>Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development</i>	Not Currently Monitored	To be monitored 2018/19

<b>8</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To conserve and enhance the District's biodiversity. (SEA)</b>	<i>Number and area of Sites of Nature Conservation Importance (SCNI) and Local Nature Reserve (LNR) within the District</i>	<b>SCNI:</b> 50 (1,049ha) <b>LNR:</b> 6 (168ha)	MSDC Monitoring 2018
	<i>Area of ancient woodland within the District</i>	5,282ha (15.8%)	MSDC Monitoring 2018
	<i>Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC &amp; Ramsar)</i>	93.8% of SSSIs in favourable or unfavourable but recovering condition	Biodiversity AMR, SxBRC (2017)
	<i>Number of planning applications approved contrary to advice given by Natural England on biodiversity issues</i>	0	MSDC Monitoring 2018
	<i>Number of dwellings permitted within the 7km Zone of Influence (SPA)</i>	429	MSDC Monitoring 2018
	<i>Capacity of Suitable Alternative Natural Greenspace (SANG)</i>	406 dwellings	MSDC Monitoring 2018
	<i>Net gain in biodiversity</i>	Not Currently Monitored	MSDC Monitoring

<b>9</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)</b>	<i>Open spaces managed to green flag standard</i>	2 (plus 1 pending accreditation)	MSDC Monitoring 2018
	<i>Number of applications approved contrary to advice from the High Weald AONB unit</i>	3	MSDC Monitoring 2018
	<i>Amount of new development (units) within the High Weald AONB</i>	Not Currently Monitored	
	<i>Number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space)</i>	48,418 (80.4%)	MSDC Monitoring 2018

	<i>Hectares of accessible open space per 1000 population.</i>	Not Currently Monitored	
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<b>10</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)</b>	<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

<b>11</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>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)</b>	<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

<b>12</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To increase energy efficiency and the proportion</b>	<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

<b>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</b>			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

<b>13</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)</b>	<i>Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"</i>	<b>Good: 1 Moderate: 14 Poor: 8 Bad: 1</b>	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

<b>14</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.</b>	<i>Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)</i>	2,217m <sup>2</sup>	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

<b>15</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>To ensure high and stable levels of employment so everyone can benefit from the economic growth of the</b>	<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

<b>District.</b>	<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>	<b>2017:</b> 0.82	ONS Job Density

<b>16</b>	<b>Indicator</b>	<b>Latest Data (2017/18 unless stated)</b>	<b>Source</b>
<b>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.</b>	<i>Net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace</i>	+14,933m <sup>2</sup>	MSDC Monitoring 2018
	<i>Number of businesses within the District</i>	<b>2016:</b> 7,980	MSDC Economic Profile
	<i>Number of new businesses setting up in the District</i>	<b>2014:</b> 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"> <li>- 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.</li> <li>- Defra 25 Year Environmental Plan</li> </ul>	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><b>Objective 8 – Biodiversity</b></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><b>Objective 9 – Landscape</b></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"> <li>· Length of greenways constructed.</li> <li>· Hectares of accessible open space per 1000 population.</li> </ul>	
<p>Natural England</p>	<p><b>Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPSGIs)</b></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 4<sup>th</sup> 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"> <li>• Green infrastructure strategies</li> <li>• Biodiversity plans</li> <li>• Rights of Way Improvement Plans</li> </ul>	<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

<b>Site Options: Ansty</b>					
<b>Settlement Category:</b> 4					
<b>Residual Need:</b> N/A (assumed windfall growth only)					
<b>Reasonable Alternatives for Assessment</b>					
<p><b>A:</b> Land at Ansty Farm, Land north of The Lizard, (Site A), Cuckfield Road. SHELAA#576. <b>Units: 75.</b></p> <p><b>B:</b> Challoners, Cuckfield Road. SHELAA#631. <b>Units: 10.</b></p> <p><b>C:</b> Ansty Cross Garage, Cuckfield Road. SHELAA#644. <b>Units: 12.</b></p> <p><b>D:</b> Extension to allocated Land at Bolney Road. SHELAA#784. <b>Units: 45.</b></p>					
<b>Objective</b>	<b>A - Ansty Farm</b>	<b>B - Challoners</b>	<b>C - Ansty Cross</b>	<b>D - Bolney Road</b>	<b>Assessment</b>
1 - Housing	+	+	+	0	Site options <b>(b), (c) and (d)</b> 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 <b>(d)</b> 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 <b>(a), (b) and (d)</b> are on green field land, though are relatively small sites of less than 100 units. Site <b>(c)</b> 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.
<b>Conclusion</b>	?	?	✓	?	

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.
<b>Conclusion</b>	✓	
<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.



<b>15 - Employment</b>	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
<b>16 - Ec. Growth</b>	+	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.
<b>Conclusion</b>	✓	
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.
<b>Conclusion</b>	×	×	×	×	
<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

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										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) 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.
<b>Conclusion</b>	✘	✓	?	✓	✘	?	?	✓	✓	

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).

<b>Site Options: Crawley Down</b>		
<b>Settlement Category: 2</b>		
<b>Residual Need: N/A (assumed windfall growth only)</b>		
<b>Reasonable Alternatives for Assessment</b>		
<b>A: Land north of Burleigh Lane. SHELAA#519. Units: 50.</b>		
<b>Objective</b>	<b>A - Burleigh Lane</b>	<b>Assessment</b>
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.

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<b>6 - Flood Risk</b>	<b>0</b>	This site option has no areas at risk from flooding, or that have suffered from flooding in the past.
<b>7 - Land Use</b>	<b>-</b>	This site option is on green field land, and is a relatively small site.
<b>8 - Biodiversity</b>	<b>0</b>	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site option.
<b>9 - Countryside</b>	<b>-</b>	This site option is outside of the High Weald AONB but is in an area of medium landscape capacity.
<b>10 - Historic</b>	<b>0</b>	This site option has no constraints in terms of listed buildings and conservation areas.
<b>11 - Transport</b>	<b>?</b>	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.
<b>12 - Energy/Waste</b>	<b>?</b>	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.
<b>13 - Water</b>	<b>?</b>	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.
<b>14 - Regeneration</b>	<b>++</b>	This site option performs positively against this objective as the sites are in close proximity to the village centre.
<b>15 - Employment</b>	<b>+</b>	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
<b>16 - Ec. Growth</b>	<b>+</b>	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.
<b>Conclusion</b>	<b>✓</b>	
<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>		

<b>Site Options: Cuckfield</b>				
<b>Settlement Category: 2</b>				
<b>Residual Need: 198</b>				
<b>Reasonable Alternatives for Assessment</b>				
<b>A:</b> Land to the north of Glebe Road. SHELAA#227. <b>Units: 84.</b>				
<b>B:</b> Land at Hanlye Lane to the east of Ardingly Road. SHELAA#479. <b>Units: 55.</b>				
<b>C:</b> Land to East of Polestub Lane. SHELAA#567. <b>Units: 120.</b>				
<b>Objective</b>	<b>A - Glebe Road</b>	<b>B - Hanlye Lane</b>	<b>C - Polestub Lane</b>	<b>Assessment</b>
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.
<b>Conclusion</b>	×	✓	×	
<p>Site options <b>(a)</b> and <b>(c)</b> 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>(b)</b> on ancient woodland could be mitigated.</p> <p>As option <b>(b)</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.

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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.
<b>Conclusion</b>	✓	✗	✗	✗	✓	✓	?	

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.
<b>Conclusion</b>	✓	

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.

## 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.

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7 - Land Use	-	-	Site options <b>(a)</b> and <b>(b)</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.
<b>Conclusion</b>	?	✓	
<p>Option <b>(b)</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>(b)</b>, these can be mitigated – policy requirements can ensure this is the case. Whilst option <b>(a)</b> performs positively against the sustainability framework, option <b>(b)</b> performs more positively and its potential allocation can contribute towards growth required at category 2 in the settlement hierarchy. Option <b>(a)</b> 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>			

<b>Site Options: Haywards Heath</b>					
<b>Settlement Category: 1</b>					
<b>Residual Need: N/A (assumed windfall growth only)</b>					
<b>Reasonable Alternatives for Assessment</b>					
<p><b>A:</b> MSDC Car Park, north of Oaklands Road. SHELAA#618. <b>Units: 8.</b></p> <p><b>B:</b> Rogers Farm, Fox Hill, Haywards Heath. SHELAA#783. <b>Units: 25.</b></p> <p><b>C:</b> Haywards Heath Golf Course, High Beech Lane, Haywards Heath. SHELAA#503. <b>Units: 630.</b></p> <p><b>D*:</b> Land to the north of Old Wickham Lane. SHELAA#988. <b>Units: 60.</b></p>					
<b>Objective</b>	<b>A - Oaklands</b>	<b>B - Rogers Farm</b>	<b>C - HH Golf Course</b>	<b>D - N. Old Wickham</b>	<b>Assessment</b>
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.
<b>Conclusion</b>	✘	✓	?	✘	
<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				
<p><b>A:</b> Land south of St. Stephens Church, Hamsland. SHELAA#184. <b>Units: 30.</b></p> <p><b>B:</b> Land at Police House Field, Birch Grove Road/Danehill Lane. SHELAA#216. <b>Units: 10.</b></p> <p><b>C:</b> Land South of The Old Police House, Birchgrove Road, Horsted Keynes. SHELAA#807. <b>Units: 25.</b></p>				
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.
<b>Conclusion</b>	✓	✓	✓	
<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.
<b>Conclusion</b>	?	?	×	
<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>				

<b>Site Options: Lindfield</b>		
<b>Settlement Category: 2</b>		
<b>Residual Need: N/A (assumed windfall growth only)</b>		
<b>Reasonable Alternatives for Assessment</b>		
<b>A: Land at Walstead Grange, Scamps Hill. SHELAA#983 Units: 270.</b>		
<b>Objective</b>	<b>A - Walstead Grange</b>	<b>Assessment</b>
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.

<b>15 - Employment</b>	<b>+</b>	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
<b>16 - Ec. Growth</b>	<b>+</b>	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.
<b>Conclusion</b>	<b>x</b>	
<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.

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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.
<b>Conclusion</b>	×	×	✓	?	

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.**

<b>Objective</b>	<b>A - Firlands</b>	<b>Assessment</b>
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.
<b>Conclusion</b>	✓	
<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>		

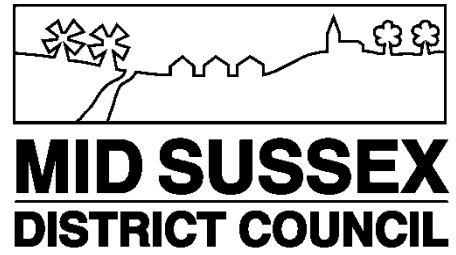
<b>Site Options: Turners Hill</b>			
<b>Settlement Category: 3</b>			
<b>Residual Need: 60</b>			
<b>Reasonable Alternatives for Assessment</b>			
<b>A: Land adjacent to 18 East Street. SHELAA#474. Units: 6.</b>			
<b>B: Withypitts Farm, Selsfield Road. SHELAA#854. Units: 16.</b>			
<b>Objective</b>	<b>A - East Street</b>	<b>B - Withypitts</b>	<b>Assessment</b>
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.
<b>Conclusion</b>	✘	✓	
<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”<sup>8</sup>. 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.

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<sup>8</sup> 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 1<sup>st</sup> 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 infrastructure<sup>9</sup> 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

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<sup>9</sup> 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

- |          |   |
|----------|---|
| <b>1</b> | To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford  |
| <b>2</b> | To improve the access to health, leisure and open space facilities and reduce inequalities in health.   |
| <b>3</b> | To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.                      |
| <b>4</b> | To improve access to retail and community facilities.   |
| <b>5</b> | To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities. |

## ENVIRONMENTAL

- |           |  |
|-----------|--|
| <b>6</b>  | 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) |
| <b>7</b>  | 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.   |
| <b>8</b>  | To conserve and enhance the District's biodiversity. (SEA)   |
| <b>9</b>  | To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA)  |
| <b>10</b> | To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)  |
| <b>11</b> | 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)   |
| <b>12</b> | 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  |
| <b>13</b> | 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:

<b>++</b>	Significant positive impact on the sustainability objective
<b>+</b>	Positive impact on the sustainability objective
<b>?</b>	Uncertain or unknown impact on the sustainability objective
<b>0</b>	No impact or neutral impact on the sustainability objective
<b>-</b>	Negative impact on the sustainability objective
<b>--</b>	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: <del>70</del> <b>35</b> dwellings.</p> <p><i>Under Urban Design Principles:</i>  <i>New first bullet point:</i></p> <ul style="list-style-type: none"> <li><b>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.</b></li> </ul> <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><b>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.</b></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>  <b>Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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><b>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.</b></p> <p><b>Proposals for specialist accommodation for older people and care homes will be supported where:</b>  <b>a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood</b></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><b>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.</b></p>

		<p><b>Plan; or</b></p> <p><b>b) It forms part of a strategic allocation; or</b></p> <p><b>c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or</b></p> <p><b>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).</b></p> <p><b>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.</b></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"> <li>To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects <b>responds to</b> the setting of the South Downs National Park <b>in its design</b>, creating .....</li> </ul> <p><i>Under Landscape Considerations:</i></p> <ul style="list-style-type: none"> <li>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</li> </ul>	<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"> <li>• <b>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.</b></li> </ul>	<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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>conserve and enhance the landscape and scenic beauty of</b> <del>minimise impact on the</del> 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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>conserve and enhance the landscape and scenic beauty of</b> <del>minimise impact on</del> 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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>conserves and enhances</b> 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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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"> <li>To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and <del>sits well within</del> <b>conserves and enhances the landscape and scenic beauty of</b> the High Weald AONB .....</li> </ul> <p><i>Under AONB:</i></p> <ul style="list-style-type: none"> <li>Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to <del>protect</del> <b>conserve</b> and enhance the landscape and scenic beauty of the High Weald AONB.</li> </ul>	<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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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>  <b>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.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>conserves and enhances the landscape and scenic beauty</b> 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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>conserves and enhances the</b></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><b>landscape and scenic beauty</b> 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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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><b>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:</b></p> <ul style="list-style-type: none"> <li><b>(i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and</b></li> <li><b>(ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.</b></li> </ul> <p><b>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.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <b>and meeting the requirement for biodiversity net gain.</b></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><b>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.</b></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 <b>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.</b></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><b>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they</b></p>



			<b>are only likely to be positive.</b>
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><b>The Council has identified some of the additional information it intends to record if it is available.</b></p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p><b>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</b></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><b>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</b></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><b>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.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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><b>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.</b></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>

			<b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b>
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. <del>or through CALA Homes development at Edwin Street to the west, the details of which need to be investigated further.</del></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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"> <li><b>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.</b></li> </ul> <p><i>Under Biodiversity and Green Infrastructure:</i>  Add new bullet point:  <b>Ensure adequate protection of the existing trees along the site boundary.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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 <del>or Woodlands Close. Detailed access arrangements will need to be investigated further.</del></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></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: Additional text at end of bullet point 6: <b>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.</b></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><b>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</b></p>

## Appendix 2 – Re-Appraisals / New Appraisals where Main Modifications alter previous SA findings

<b>SA25: Land west of Selsfield Road, Ardingly</b>			
<b>Reasonable Alternatives for Assessment</b>			
<p><b>A:</b> Land west of Selsfield Road. SHELAA#832. Regulation 19 / Submission stage <b>Units: 70.</b></p> <p><b>B:</b> Land west of Selsfield Road. SHELAA#832. Main Modifications stage <b>Units: 35.</b></p>			
<b>Objective</b>	<b>A – Reg. 19 / Submission</b>	<b>B – Main Modifications</b>	<b>Assessment</b>
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.

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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.
<b>Conclusion</b>	✓		
<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>			



<b>Older Persons Accommodation</b>			
<b>Reasonable Alternatives for Assessment</b>			
<p><b>Option (a):</b> 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><b>Option (b):</b> To not have a policy, and therefore rely on District Plan Policy <b>DP30: Housing Mix</b>.</p>			
<b>Objective</b>	<b>A</b>	<b>B</b>	<b>Assessment</b>
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.
<b>Summary of Appraisal:</b>			
Both options <b>(a)</b> and <b>(b)</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 <b>(a)</b> in place. In addition, option <b>(a)</b> provides certain requirements related to sustainable travel which is not present in DP30: Housing Mix (option <b>(b)</b> ) and therefore more positive impacts are expected against this objective.			
<b>Cross-Border Impacts:</b>			
There are no cross-border impacts likely to arise from this policy.			
<b>Recommendations and Mitigation Measures:</b>			
None suggested			
<b>Preferred Option:</b>	<b>A</b>		