

Sustainability Appraisal of the Mid Sussex Development Plan Review

DRAFT Regulation 18 SA Report

October 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



Sustainability Appraisal of the Mid Sussex Development Plan Review 2021 - 2039

Draft Regulation 18 SA Report

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About this report & notes for readers

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This Regulation 18 SA Report is based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published. This report was prepared between December 2021 and October 2022 and is subject to and limited by the information available during this time.

This report has been produced to assess the sustainability effects of the Mid Sussex Development Plan Review and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & Abbreviations



A&E	Accident and Emergency
ALC	Agricultural Land Classification
ANA	Archaeological Notification Area
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BUAB	Built Up Area Boundary
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DM	Development Management
DMRB	Design Manual for Roads and Bridges
DPR	District Plan Review
EU	European Union
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LSE	Likely Significant Effect
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MHCLG	Ministry of Housing, Communities and Local Government
MSDC	Mid Sussex District Council
MSA	Mineral Safeguarding Area
NHS	National Health Service
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PRoW	Public Rights of Way
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
TAG	Transport Analysis Guidance
TPO	Tree Preservation Order

Executive Summary

About this report

- E1 Lepus Consulting has undertaken a Sustainability Appraisal (SA) of the Mid Sussex District Plan Review (DPR) 2021-2039. SA is the process of informing and influencing the preparation of a Development Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Development Plan.
- E2 Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014-2031 in March 2018. In this document the Council committed to reviewing the District Plan, starting in 2021, in accordance with the 5-year review requirement set out in national policy. This SA accompanies the consultation draft (Regulation 18) Mid Sussex District Plan Review 2021 – 2039.
- E3 The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for those areas of the district lying within its boundaries.
- E4 This SA/SEA report is based on the findings of the Scoping Report, prepared by MSDC in November 2021¹. The Scoping Report describes the baseline context and identifies the key sustainability issues in the plan area which informs the preparation of the SA Framework. A copy of the SA Framework is provided in **Appendix A**. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.
- E5 The purpose of this report is to provide an appraisal of each option (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework. This will help the Council to evaluate the sustainability performance of different options and to prepare a Local Plan which seeks to be more economically, environmentally and socially sustainable.

Summary findings

- E6 This report sets out the findings of the SA of the two alternative spatial options for the distribution of development, 42 reasonable alternative site allocations for residential development and 56 draft DPR policies.
- E7 A total of 56 draft policies have been identified by MSDC. The majority of the draft DPR policies set out requirements for development proposals which ultimately seek to protect the natural and built environment and ensure there is sufficient social infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix, affordable and accessible housing, protecting designated landscapes and biodiversity sites, such as the High Weald Area of Outstanding Natural Beauty (AONB), the setting to the South Downs National Park and Ashdown Forest Special Protection Area (SPA) and Special Area

¹ Mid Sussex District Council (2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

of Conservation (SAC), managing flood risk and seeking to adapt to and mitigate climate change. This SA report also sets out recommendations on how to further develop these policies to maximise environmental and social benefits.

E8 The SA has identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Some of the adverse impacts identified are associated with the loss of soil, surface water flooding and loss of or damage to ancient woodland. Some of these negative impacts could potentially be mitigated through policy, and the mitigating effects of the draft DPR policies upon reasonable alternative site allocations is presented in this SA report.

E9 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the DPR to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of preparing this SA. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The emerging Regulation 18 HRA² explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA/SAC and Castle Hill SAC, and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and recreational pressure. The preliminary findings indicate that through implementing appropriate mitigation (in liaison with Natural England) it will be possible to conclude that the DPR will not cause any adverse impacts on site integrity. The final conclusions of the HRA process will be used to inform and update the SA, when available, at the Regulation 19 Stage.

Next steps

E10 This Regulation 18 SA Report is subject to consultation. This report represents the latest stage of the SA process. The SA process will take on-board any comments on this report and use them to inform the next stage of the appraisal process.

² AECOM (2022) Habitats Regulations Assessment of the Mid Sussex District Plan Review, Regulation 18. Draft – July 2022.

1 Introduction

1.1 Background

1.1.1 Mid Sussex District Council (MSDC) is in the process of preparing the Mid Sussex District Plan Review (DPR). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the DPR process by identifying, describing and evaluating the likely significant effects of the DPR and the reasonable alternative options in relation to environmental, social and economic factors.

1.1.2 Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014-2031 in March 2018. In this document the Council committed to reviewing the District Plan, starting in 2021, in accordance with the 5-year review requirement set out in national policy. This SA accompanies the consultation draft (Regulation 18) Mid Sussex District Plan 2021 – 2039.

1.1.3 The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for those areas of the district lying within its boundaries.

1.1.4 This SA/SEA report is based on the findings of the Scoping Report, prepared by MSDC in November 2021³. The Scoping Report describes the baseline context and identifies the key sustainability issues in the plan area which informs the preparation of the SA Framework. A copy of the SA Framework is provided in **Appendix A**. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.

1.1.5 The purpose of this report is to provide an appraisal of each option (called ‘reasonable alternatives’ in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework. This will help the Council to evaluate the sustainability performance of different options and to prepare a Local Plan which seeks to be more economically, environmentally and socially sustainable.

1.2 Mid Sussex – Local context

1.2.1 Mid Sussex is a rural district in the South East of England. The district has three towns, Burgess Hill, East Grinstead and Haywards Heath (see **Figure 1.1**). The 2021 census records the number of residents as 152,600⁴. Approximately 62% of the Mid Sussex population live in the three towns, with the remaining 38% living in the villages. The district has a higher than average number of retired residents (aged over 65).

³ Mid Sussex District Council (2021) ‘District Plan Review: Sustainability Appraisal: Scoping Report’ Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

⁴ ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021> [Date accessed: 04/10/22]

- 1.2.2 Nearly 50% of the district is within the High Weald Area of Outstanding Natural Beauty (AONB), and over 10% is within the South Downs National Park. Between lies an area of landscape known as the Low Weald. Mid Sussex is the tenth most wooded district in the South East and two-thirds of this woodland is classified as ‘ancient woodland’. It also has many sites valued for their biodiversity. Ashdown Forest, lying in neighbouring Wealden District Council area, is a Habitats site designated as both a Special Protection Area and Special Area of Conservation. Its proximity to Mid Sussex means that a Habitats Regulations Assessment (HRA) of the DPR is required. The district’s attractive natural environment and rich heritage makes it highly valued by its residents and a popular tourist destination.
- 1.2.3 Mid Sussex District has a very low level of unemployment. It has a relatively skilled and educated workforce and has access to further educational establishments within the district and two universities in Brighton. The district is well connected with good links by road and rail to London, Brighton and Gatwick and is within easy travelling distance of the Channel Tunnel, Southampton and Dover.
- 1.2.4 Several innovative and nationally known businesses are located in the district. A third of businesses are within the professional, scientific and technical, and information and communication sectors. There is a range of smaller businesses across sectors such as finance, service industries and light manufacturing. The nature of the local economy is strongly influenced by the wider regional context in which it sits. Mid Sussex is located in proximity to Crawley and London Gatwick Airport and within commuting distance of London and Brighton and the south coast. The Council is a partner in the Gatwick Diamond Initiative (an economic area centred upon the airport but covering nine local authority areas) and the larger ‘Coast to Capital’ Local Enterprise Partnership which stretches from Chichester in the west to Brighton in the south through to Croydon in the north.

1.3 The Development Plan Review

- 1.3.1 The Mid Sussex District Plan 2014-2031⁵ was adopted in March 2018. It provides a framework for new residential development, employment growth and infrastructure as well as measures to protect the natural and historic environment and support local communities.
- 1.3.2 The Mid Sussex District Plan set out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) in order to allocate housing and employment sites to address the needs identified in the District Plan, to allocate a site for a Science and Technology Park, west of Burgess Hill and to set out additional strategic policies relating to the delivery of sustainable development. The Site Allocations DPD was adopted by the Council in June 2022.
- 1.3.3 Following the Examination in Public of the District Plan and the acknowledgement of the of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review the District Plan commencing in 2021 with submission to the Secretary of State in 2023. This SA report assesses the sustainability performance of the alternative options considered during this Development Plan Review.

⁵ Mid Sussex District Council ‘Mid Sussex District Plan 2014 – 2031’ Adopted March 2018 Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/> [Date Accessed: 28/09/22]

1.3.4 The District Plan Review will determine the overall strategy future development across the district for those areas outside the South Downs National Park (i.e. the Plan Area) to 2039 including the location of residential development to address the identified housing need.

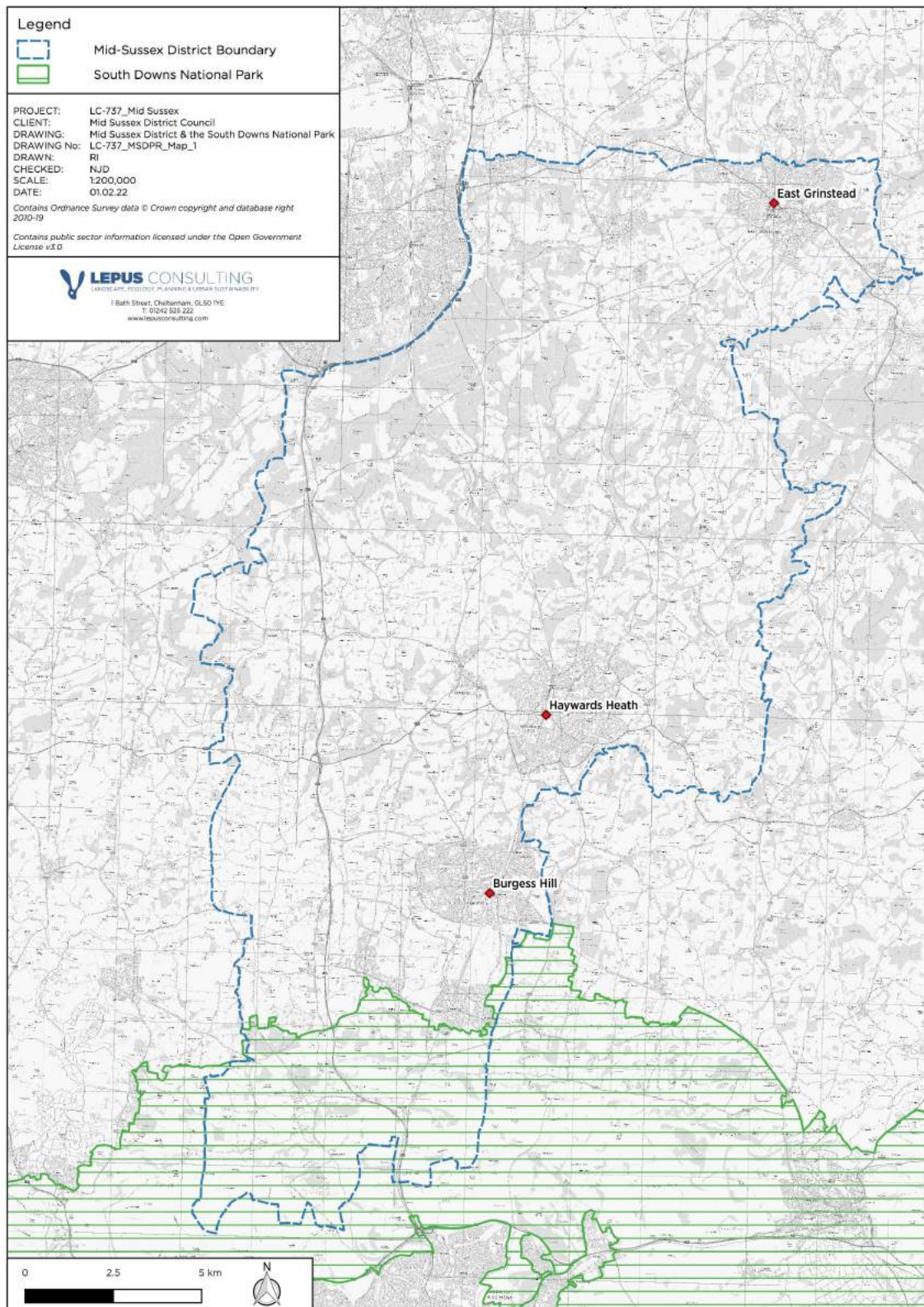


Figure 1.1: Mid Sussex District Plan Area (the District Plan Review applies to the area of Mid Sussex located outside of the South Downs National Park.)

1.4 Sustainability Appraisal and Strategic Environmental Assessment

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC⁶ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁷ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Mid Sussex DPR to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁸ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012⁹. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

⁶ SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 28/09/22]

⁷ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 28/09/22]

⁸ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 28/09/22]

⁹ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date Accessed: 28/09/22]

1.5 Best Practice Guidance

1.5.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment¹⁰;
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹¹;
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)¹²;
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)¹³; and
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹⁴.

1.6 Sustainability Appraisal

1.6.1 This report is a component of the SA of the Mid Sussex DPR. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to Planning Practice Guidance.

¹⁰ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date Accessed: 28/09/22]

¹¹ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 28/09/22]

¹² National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Date Accessed: 28/09/22]

¹³ Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 28/09/22]

¹⁴ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 28/09/22]

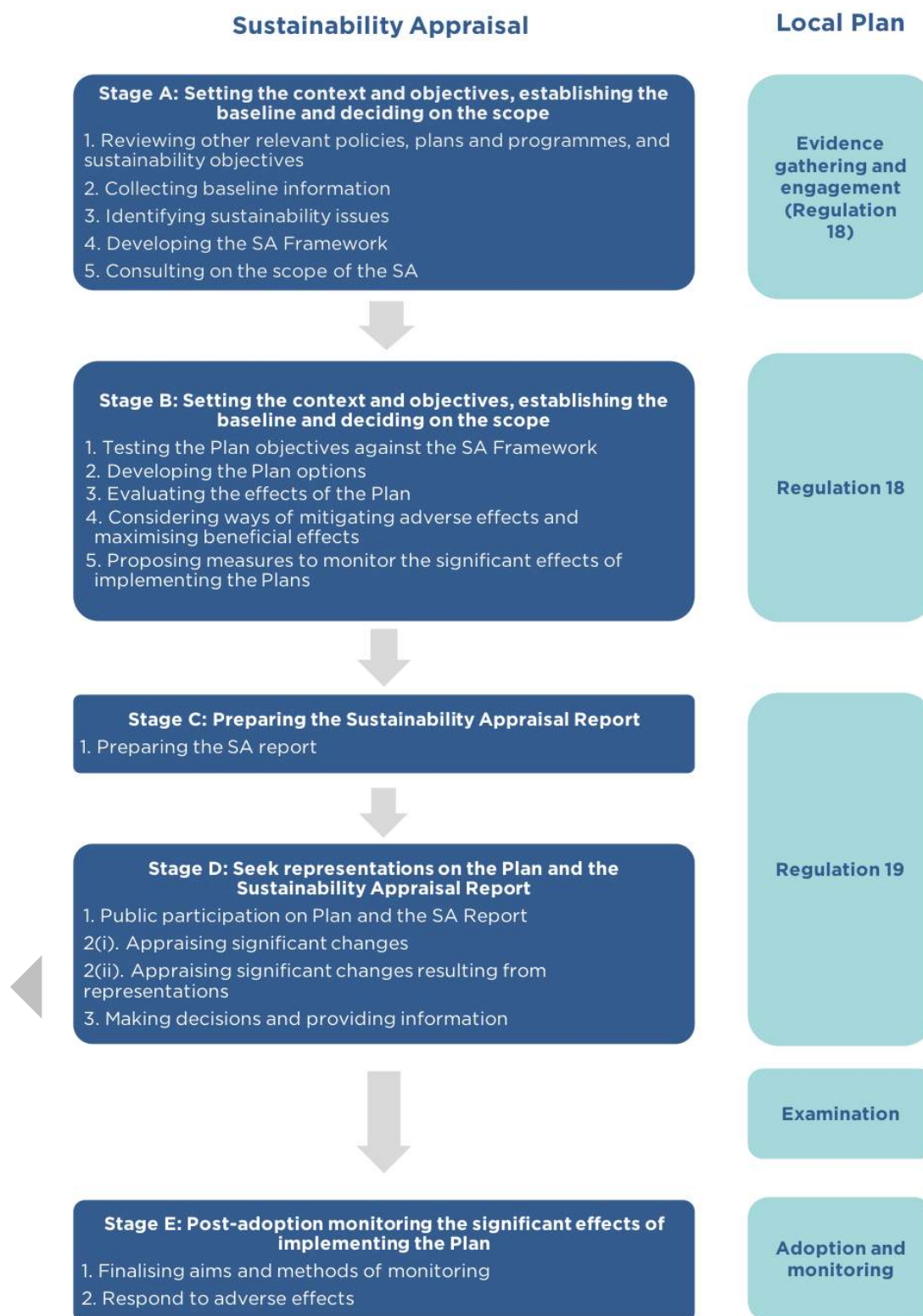


Figure 1.2: Sustainability appraisal process

1.7 The SA process so far

- 1.7.1 The Mid Sussex DPR will include the overall strategy for development in the plan area to 2039, including a vision for the future, relevant objectives, site allocations and planning policies.
- 1.7.2 The purpose of the DPR is to review existing planning policy documents and the evidence base and determine the development needed within the plan area to 2039. It will also set out policies which will guide the determination of planning applications.
- 1.7.3 **Table 1.1** below presents the of stages of the DPR and SA process undertaken to date. These represent Stages A and B of the SA process set out in **Figure 1.2**.

Table 1.1: The MSDPR and sustainability process so far

Date	Local Plan stage	Sustainability Appraisal
November 2021	Evidence Gathering	<p>Mid Sussex District Council DPR: Sustainability Appraisal Scoping Report</p> <p>This report reviews the key issues in relation to social, economic and environmental factors across the Mid Sussex plan area. These issues feed into the development of the SA Framework which sets out 14 criteria for the assessment of the sustainability performance of the plan options.</p>
November - December 2022	<p>Mid Sussex District Plan Review: Regulation 18</p> <p>This is the current stage of local plan preparation which is being assessed in this Sustainability Appraisal.</p>	<p>Sustainability Appraisal: Regulation 18</p> <p>The DPR has considered a number of reasonable alternatives including two spatial options, six broad locations and 42 sites.</p>

1.8 Scoping Report

- 1.8.1 In order to identify the scope and level of detail of the information to be included in the SA process, a SA Scoping Report was produced by Mid Sussex District Council in November 2021. The Scoping Report was subject to consultation with the statutory consultees and other relevant bodies.
- 1.8.2 The Scoping Report states that the review of the District Plan policies will likely result in the following status of each policy:
- Policies that remain 'in-date' and will not require amendment;
 - Policies that require minor update rather than a full review;
 - Policies that require a full review; and
 - New policies to supplement existing policies.

1.9 District Plan Review

- 1.9.1 MSDC is in the process of undertaking the Development Plan Review. Based on the evidence gathering and consultation undertaken previously, the Preferred Options Plan sets out SSDC's proposed approach to delivering the development needs of the district and the draft policies to guide the nature of the development and protect valuable community, historic and natural assets.
- 1.9.2 The total housing requirement for Mid Sussex District is 1,119 dwellings per annum, which equates to a total of 20,142 dwellings between 2021 and 2039. There are currently 10,786 commitments (sites already allocated or with planning permission) and 1,187 dwellings completed within the first year of the Plan period (2021/22). Therefore, to meet the housing need for the district, a minimum of 8,169 dwellings are required. The draft District Plan allocations and windfall allowance totals 8,471 dwellings.

1.10 Signposting for this report

- 1.10.1 This Regulation 18 SA Report sets out an assessment of the reasonable alternatives considered in the preparation of the Mid Sussex DPR, including two spatial options, 56 draft policies and 42 reasonable alternative sites. The SA report also sets out the reasons for selecting and rejecting reasonable alternative sites.
- 1.10.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:
- **Chapter 2** sets out the methodology used to present and assess the findings of the SA process.
 - **Chapter 3** sets out an overview and analysis of the appraisal of the two spatial options for the distribution of development.
 - **Chapter 4** presents a summary of the reasonable alternative site assessments without the mitigating influence of the draft DPR policies.
 - **Chapter 5** sets out a summary of the sustainability performance of the draft DPR policies.
 - **Chapter 6** presents a summary of the reasonable alternative site assessments, including the considering of DPR policies as mitigation.
 - **Appendix A** presents the SA Framework.
 - **Appendix B** presents the complete assessment of the two spatial options.
 - **Appendix C** presents the complete assessment of the 42 reasonable alternative sites.
 - **Appendix D** presents the complete assessment of the 56 draft DPR policies.
 - **Appendix E** presents the post-mitigation site assessments.

2 Methodology

2.1 Scoping stage

2.1.1 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes, projects, guidance and initiatives;
- Collecting baseline information;
- Identifying key sustainability issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of the SA with the consultation bodies.

2.1.2 The Scoping Report¹⁵ was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties. A range of comments were received during the consultation, primarily relating to the indicators. The comments received have largely been addressed, due in part to the assessment of reasonable alternative sites against a number of indicators within this SA report that were not previously listed in the Scoping Report and the full methodology as presented in this chapter.

2.1.3 The Scoping Report sets out the key sustainability issues in the SA Framework. Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

1. **Housing:** To ensure that everyone has the opportunity to live in a home for their need and which they can afford.
2. **Health and wellbeing:** To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.
3. **Education:** To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.
4. **Community and crime:** To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.
5. **Flooding and surface water:** To reduce the risk to people, properties, the economy and the environment of flooding from all sources.
6. **Natural resources:** 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.
7. **Biodiversity and geodiversity:** To conserve and enhance the district's biodiversity and geodiversity.

¹⁵ Mid Sussex District Council (2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

8. **Landscape:** To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.
9. **Cultural heritage:** To protect, enhance and make accessible for enjoyment, the district's historic environment.
10. **Climate change and transport:** The reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.
11. **Energy and waste:** To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal.
12. **Water resources:** To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management.
13. **Economic regeneration:** To encourage the regeneration and prosperity of the district's existing town centres and support the viability and vitality of village and neighbourhood centres.
14. **Economic growth:** To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

2.1.4 The SA Framework is comprised of SA Objectives, decision-making criteria and monitoring indicators. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations¹⁶. Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.

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

¹⁶ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in subparagraphs (a) to (l).”

2.2 Assessment of reasonable alternatives

2.2.1 The purpose of this document is to provide an appraisal of the reasonable alternatives, also known as ‘options’, (those listed in **Table 1.1**) in line with Regulation 12 of the SEA Regulations¹⁷:

2.2.2 *“Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.*

2.2.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Table 2.1**).

Table 2.1: Schedule 1 of the SEA Regulations

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

¹⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed 28/09/22]

2.3 Impact assessment and determination of significance

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

2.4 Sensitivity

2.4.1 Receptor sensitivity has been measured through consideration as to how the receiving environment may be affected by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.4.2 A guide to the range of scales used in determining sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

Table 2.2: Impact sensitivity

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

2.5 Impact magnitude

2.5.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change (see **Table 2.3**).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> • Likely total loss of or major alteration to the receptor in question; • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or the impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or the impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.6 Significant effects

2.6.1 A single value from **Table 2.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.4: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of development proposals would be likely to:</p> <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	<p>Either no impacts are anticipated, or any impacts are anticipated to be negligible.</p>
Uncertain +/-	<p>It is entirely uncertain whether impacts would be positive or adverse.</p>
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 2.6.2 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the precautionary principle¹⁸ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option. Within the reasonable alternative site assessments, presented in **Appendix C**, the likely sustainability impacts are presented per ‘receptor’ within each SA Objective, offering further granularity in the presentation of effects.
- 2.6.3 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.6.4 The level of effect has been categorised as minor or major. **Table 2.4** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.6.5 Each reasonable alternative option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 2.4**. Likely impacts are not intended to be summed.
- 2.6.6 It is important to note that the assessment scores presented in **Table 2.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. Topic specific methods and assumptions in **Boxes 2.1 to 2.14** offer further insight into how each significant effect score was determined.
- 2.7 Limitations of predicting effects**
- 2.7.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.7.2 The assessments in this report are based on the best available information, including that provided to Lepus by MSDC and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

¹⁸ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

2.7.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

2.7.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.

2.7.5 All data used is secondary data obtained from the Council or freely available on the Internet.

2.8 Plan area statistics

2.8.1 To calculate some of the likely adverse impacts of the proposed development, an average people per dwelling needed to be calculated for each of the three districts. **Table 2.5** below shows the estimated population size and dwelling stock of the district, which was used to calculate the average people per dwelling. All data used was accurate and up to date at the time of assessment.

Table 2.5: Average people per dwelling in Mid Sussex in 2020

District	Estimated Population Size ¹⁹	Dwelling Stock ²⁰	People per Dwelling
Mid Sussex	152,142	65,503	2.32

2.9 SEA Topic methodologies and assumptions

2.9.1 A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Boxes 2.1 to 2.14**). These should be borne in mind when considering the assessment findings.

¹⁹ Office of National Statistics (2021) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> [Date Accessed: 17/12/21]

²⁰ Ministry of Housing, Communities and Local Government (2021) Number of dwellings by tenure and district, England. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date Accessed: 17/12/21]

2.10 SA Objective 1 – Housing

Box 2.1: SA Objective 1. Housing - Assessment methodologies and assumptions

1. Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.

MSDC has prepared evidence documents in relation to establishing housing needs over the Plan period. This includes a Strategic Housing and Employment Land Availability Assessment (SHELAA)²¹ and a Strategic Housing Market Assessment (SHMA). Options are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area.

When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability²².

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

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

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

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

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

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

²¹ Mid Sussex District Council (2020) Strategic Housing and Economic Land Availability Assessment (SHELAA). Available at: <https://www.midsussex.gov.uk/planning-building/strategic-housing-and-economic-land-availability-assessment/> [Date Accessed: 28/09/22]

²² Dempsey, N., Brown, C. and Bramley, G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. *Progress in Planning* 77:89-141

2.11 SA Objective 2 – Health and wellbeing

Box 2.2: SA Objective 2. Health and Wellbeing - Assessment methodologies and assumptions

2. Health and Wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.

Air Quality:

It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road²³. Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution.

Air Quality Management Areas (AQMAs) are considered to be areas where the national air quality objectives will not be met.

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

Health Facilities:

In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the MSDPR should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of accessible natural habitats and the surrounding PRoW network. Sustainable distances to NHS hospitals and leisure centres are derived from Barton et al.²⁴.

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

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

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

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

²³ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date Accessed: 28/09/22]

²⁴ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Box 2.2: SA Objective 2. Health and Wellbeing - Assessment methodologies and assumptions

walk from a GP surgery would be likely to have a minor negative impact on site end users' access to essential health care.

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

PRoW Network:

New development sites have been assessed in terms of their access to the local PRoW networks and public greenspace. In line with Barton et al.²⁵, a sustainable distance of 600m has been used for access to a PRoW. Development proposals that are located within 600m of a PRoW would be expected to have a minor positive impact on pedestrian accessibility and access to the countryside. Development proposals located over 600m from a PRoW could potentially have a minor negative impact on site end users' access to natural habitats, and therefore have an adverse impact on the physical and mental health of local residents.

Multi-functional greenspace:

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

²⁵ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

2.12 SA Objective 3 - Education

Box 2.3: SA Objective 3. Education - Assessment methodologies and assumptions

3. Education: 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.

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

The Council have identified that development proposals within a 20 minute walk to a primary school are in a sustainable location to these facilities. In line with Barton et al.'s sustainable distances²⁶, for the purpose of this assessment, 1.5km is considered as the sustainable distance to a secondary school and 3km to a further education facility. All schools identified are publicly accessible state schools.

Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances. To this end, (and given their age) this is predominantly on public transport such as bus/train or dedicated school bus services. MSDC's site selection process therefore places more weight on the Primary School criteria as these should be located at a distance more accessible by foot/cycle/walking clubs/lift-share.

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

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

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

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

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

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

²⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

2.13 SA Objective 4 – Community and crime

Box 2.4: SA Objective 4. Community and crime - Assessment methodologies and assumptions

4. Community and crime: To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.

Community facilities:

Sustainable access to community facilities, including libraries, banks and retail areas, is identified by the Council as being within a 15 minute walk from a proposed residential site, or 30 minutes via public transport.

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

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

Built Up Area Boundaries:

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

Crime and deprivation

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

2.14 SA Objective 5 – Flooding and surface water

Box 2.5: SA Objective 5. Flooding and surface water - Assessment methodologies and assumptions

5. Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources.

Fluvial Flooding

The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data²⁷, such that:

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

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

Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected.

Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation.

Surface water (Pluvial) Flooding

According to Environment Agency data²⁸, areas determined to be at high risk of pluvial flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance. Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on pluvial flooding for the purposes of this assessment.

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

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

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

²⁷ Environment Agency (2021) Flood Map for Planning Risk. Available at: <https://flood-map-for-planning.service.gov.uk> [Date Accessed: 28/09/22]

²⁸ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date Accessed: 28/09/22]

2.15 SA Objective 6 – Natural resources

Box 2.6: SA Objective 6. Natural resources: - Assessment methodologies and assumptions

6. Natural resources: 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.

Previously Developed Land:

In accordance with the core planning principles of the NPPF²⁹, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

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

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

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

Agricultural Land Classification:

The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land³⁰. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land.

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

For the purpose of this report, a 20ha threshold has been used based on available guidance³¹. Development proposals which would result in the loss of less than 20ha of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a major negative impact on this objective.

Development proposals which are situated on Grade 4 and 5 ALC land would be expected to have a negligible impact on natural resources. Development proposals on land classified

²⁹ Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 28/09/22]

³⁰ Natural England (1988) Agricultural Land Classification of England And Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date Accessed: 28/09/22]

³¹ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 28/09/22]

Box 2.6: SA Objective 6. Natural resources: - Assessment methodologies and assumptions

as 'urban' or 'non-agricultural' would help prevent the loss of the Plan area's BMV land, and therefore would be expected to have a minor positive impact for this objective.

Water Consumption:

It is assumed that development proposals will be in accordance with the higher optional water efficiency standard of 110 litres per person per day, as set out in the Building Regulations 2010³², in accordance with the current adopted District Plan policy.

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

Minerals:

Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSA)³³. Identified MSAs within Mid Sussex include the following minerals resources: brick clay; chalk; consolidated bedrock; unconsolidated gravel; and unconsolidated sand.

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

³² The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date Accessed: 28/09/22]

³³ West Sussex County Council (2018) 'West Sussex Joint Minerals Local Plan' Available at <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/> [Date accessed 31/01/22]

2.16 SA Objective 7 - Biodiversity and geodiversity

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

7. Biodiversity and geodiversity: To conserve and enhance the district's biodiversity and geodiversity.

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

Designated Sites:

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

Habitats and Species:

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

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

Negative impacts would be expected where the following ecological designations may be harmed or lost as a result of proposals: SPAs, SACs, Ramsar sites, SSSIs, ancient woodlands, NNRs, LNRs and LWSs as well as priority habitats³⁴ protected under the 2006 NERC Act³⁵. The assessment is largely based on a consideration of the proximity of a site to these ecological receptors.

For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England's publicly available Priority Habitat Inventory database³⁶. It is acknowledged that this may not reflect current local site conditions in all instances.

It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the

³⁴ Source Natural England Priority Habitat Inventory April 2012

³⁵ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 28/09/22]

³⁶ Natural England (2021) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddb7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 28/09/22]

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 6) in this assessment.

It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.

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

It is anticipated that MSDC will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.

It is assumed that mature trees and hedgerows will be retained where possible.

Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts³⁷. Where a site falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment. The IRZ attribute data draws a distinction between rural and non-rural development. For the purposes of this assessment non-rural sites are considered to be those that are located within an existing built-up area. Sites at greenfield locations at the edge of a settlement or those that are more rural in nature have been considered to be rural.

A 7km zone of influence (Zoi) has been identified around Ashdown Forest SAC/SPA within which planning applications for residential development will need to mitigate the potential impacts of the development to ensure the effects of any increase in visitors to Ashdown Forest are addressed³⁸. For the purposes of this assessment, it is assumed that development within this 7km zone could potentially result in a minor negative impact on the designation.

A HRA is being prepared alongside the development of the Plan to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of preparing this SA. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The emerging Regulation 18 HRA³⁹ explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA/SAC and Castle Hill SAC, and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and

³⁷ Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 28/09/22]

³⁸ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Date Accessed: 28/09/22]

³⁹ AECOM (2022) Habitats Regulations Assessment of the Mid Sussex District Plan Review, Regulation 18. Draft – July 2022.

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

recreational pressure. The final results of the HRA process will be used to inform and update the SA, when available, at the Regulation 19 Stage.

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

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

An assessment of potential impacts on veteran trees has been informed by comments from the Tree Officer on SHELAA sites. Development proposals which coincide with a veteran tree could potentially result in the irreversible loss of the asset, and therefore have a major negative impact. Development proposals which are located adjacent to a veteran tree could potentially result in a minor negative impact.

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

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2.17 SA Objective 8 - Landscape

Box 2.8: SA Objective 8. Landscape - Assessment methodologies and assumptions

8. Landscape: To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.

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

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

The High Weald AONB

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

Objective OQ3 of the High Weald AONB Management Plan 2019 – 2024⁴⁰ aims to “*develop and manage access to opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty*”.

The assessment of potential impacts on the AONB arising from development has been informed by comments from specialist landscape officers (provided by the Council) and the Landscape Capacity Study⁴¹. Development proposals which are coincident with and have been identified as likely to cause a ‘high’ impact to this AONB would be likely to alter the character of the nationally designated landscape and therefore, a major negative impact would be expected. Development proposals within the AONB with identified ‘moderate’ impacts are assessed as having the potential for major negative impacts on the setting of the AONB. Development proposals which are located in close proximity to the AONB and are identified as having ‘low’ to ‘low/medium’ capacity could potentially result in a minor negative impact on the setting of the nationally designated landscape.

In some instances where proposed sites coincide with areas of ‘high’ impact on the AONB, the site has been concluded as likely ‘major development’ as described in the NPPF paragraph 177⁴².

South Downs National Park:

⁴⁰ The High Weald Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/2291-high-weald-managment-plan-4th-edition-2019-2024/file.html> [Date accessed: 28/09/22]

⁴¹ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

⁴² MHCLG (2021) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Date accessed: 04/10/22]

Box 2.8: SA Objective 8. Landscape - Assessment methodologies and assumptions

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

Country Park:

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

Views:

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

In order to consider potential visual effects of development, it has been assumed that the proposals would broadly reflect the character of nearby development of the same type.

Potential views from residential properties are identified through reference to aerial mapping and the use of Google Maps⁴³.

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

Urbanisation of the Countryside/ Coalescence:

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

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

Multi-Functional Greenspace

Development proposals located within 300m of areas designated as multi-functional greenspace (MFGS) and open playspace are likely to provide good access to natural open space for future residents and therefore a minor positive impact on the landscape objective would be expected.

Tree Preservation Orders

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

⁴³ Google Maps (no date) Available at: <https://www.google.co.uk/maps> [Date Accessed: 28/09/22]

2.18 SA Objective 9 – Cultural heritage

Box 2.9: SA Objective 9. Cultural heritage - Assessment methodologies and assumptions

9. Cultural heritage: To protect, enhance and make accessible for enjoyment, the district's historic environment.

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

Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas.

It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the MSDPR). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

Setting:

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

Heritage Assets:

The site assessments for Listed Buildings and Conservation Areas are based on the levels of harm which the developments may have on these assets, as identified within the SHELAA assessments provided by the Council. Where a site coincides with or is in close proximity to a Listed Building or Conservation Area, and is identified as having the potential to have 'substantial' levels of harm and a 'harmful impact', a major negative impact on the historic environment would be expected.

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

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

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

Where the site lies adjacent to, or in close proximity to, an SM or an RPG, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact would therefore be expected.

Archaeological Notification Areas (ANAs) have been identified within Mid Sussex. The assessment of RA sites has been informed through reference to the SHELAA and

Box 2.9: SA Objective 9. Cultural heritage - Assessment methodologies and assumptions

comments from a Mid Sussex County Archaeologist. Where development has been identified as resulting in ‘severe’ impacts on archaeological features, a major negative impact on the historic environment would be expected. Where the site is identified as having the potential to have a ‘moderate’ impact on archaeological features, a minor negative impact on the historic environment would be expected. A site deemed to have no impact on these assets, or where no objection has been raised, would be likely to have a negligible impact.

Heritage assets identified on Historic England’s Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment⁴⁴. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.

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

⁴⁴ Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 05/01/22]

2.19 SA Objective 10 – Climate change and transport

Box 2.10: SA Objective 10. Climate change and transport- Assessment methodologies and assumptions

10. Climate change and transport: To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.

Carbon Emissions

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

The Mid Sussex District Council Sustainability Strategy 2018 - 2023⁴⁵ sets out the Council's approach to delivering sustainable development. The Strategy includes a Sustainability Action Plan which includes themes of energy efficiency, climate change and sustainable travel. The Strategy also sets out statutory sustainability responsibilities as set out in legislation, including the Paris Climate Change Agreement (2015), The Climate Change Act (2008) and the National Cycling and Walking Investment Strategy (2017).

AQMA

Exposure of new residents to air pollution has been considered in the context of the development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "*beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*"⁴⁶. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{47 48}. A buffer distance of 200m has therefore been applied in this assessment.

Main Road

The proximity of a site in relation to a main road determines the exposure level of site end users to road related air and noise emissions⁴⁹. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road.

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

⁴⁵ Mid Sussex District Council (2018) Mid Sussex District Council Sustainability Strategy 2018 – 2023. Available at: <https://www.midsussex.gov.uk/media/3469/msdc-sustainability-strategy.pdf> [Date Accessed: 05/01/22]

⁴⁶ Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-december-2015> [Date Accessed: 05/01/22]

⁴⁷ Bignal, K., Ashmore, M & Power, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁴⁸ Ricardo-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

⁴⁹ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date Accessed: 05/01/22]

Box 2.10: SA Objective 10. Climate change and transport- Assessment methodologies and assumptions

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

Public Transport

Access to public transport via bus link has been assessed on the basis of distance to a bus stop and its frequency, resulting in either excellent (major positive impact), good (minor positive impact), fair (negligible impact) or poor access to bus services.

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

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

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

2.20 SA Objective 11 – Energy and Waste

Box 2.11: SA Objective 11. Energy and Waste - Assessment methodologies and assumptions

11. Energy and waste: To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal.

Household Waste

For the purpose of this assessment, it is assumed that new residents in Mid Sussex will have an annual waste production of 399kg per person, in line with the England average⁵⁰.

Between 2020 and 2021, the total waste collected by Mid Sussex Council was 52,161 tonnes⁵¹.

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

Energy consumption

In 2016, 40% of UK emissions came from households through use of heating, electricity, transport, aviation and waste⁵². For the purpose of this assessment, it is assumed that larger developments within the Plan area will lead to greater energy consumption and related GHG emissions. Therefore, as a means of deducing smaller developments from larger ones, residential sites proposed for 100 units or more are assessed as having a major negative impact on energy consumption and related GHG emissions. Residential sites proposed for 10 units or more are assessed as having a minor negative impact on this receptor, and less than 10 residential units will have a negligible impact.

⁵⁰ Department for Environment and Rural Affairs (2021) Local authority collected waste generation from April 2000 to March 2021 (England and regions) and local authority data April 2018 to March 2019. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 05/01/22]

⁵¹ Ibid

⁵² Committee on Climate Change (2016) The Fifth Carbon Budget. Available at: <https://www.theccc.org.uk/wp-content/uploads/2016/07/5CB-Infographic-FINAL-.pdf> [Date Accessed: 05/01/22]

2.21 SA Objective 12 – Water resources

Box 2.12: SA Objective 12. Water resources - Assessment methodologies and assumptions

12. Water resources: To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management.

Groundwater:

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

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

Watercourses:

Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water⁵³. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted⁵⁴. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. In this assessment, a 200m buffer zone was deemed appropriate.

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

⁵³ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://www.who.int/water_sanitation_health/resourcesquality/wgmchap2.pdf [Date Accessed: 05/01/22]

⁵⁴ Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 05/01/22]

2.22 SA Objective 13 – Economic regeneration

Box 2.13: SA Objective 13. Economic regeneration- Assessment methodologies and assumptions

13. Economic regeneration: To encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres.

Economic regeneration:

New residents, in line with Council calculated sustainable distances, should be situated within 15 minutes walking distance or 30 minutes by public transport from a superstore, town centre, high street or shopping centre to ensure that they have access to a range of facilities. Good sustainable access to these services and facilities will likely lead to economic stimulation and regeneration, where an increase in footfall could positively impact the local economy and provide new job opportunities.

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

2.23 SA Objective 14 – Economic growth

Box 2.14: SA Objective 14. Economic growth- Assessment methodologies and assumptions

14. Economic growth: To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

Employment Opportunities:

It is assumed that, in line with Barton et al.'s sustainable distances⁵⁵, new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. These existing employment areas have been identified by MSDC.

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

Employment Floorspace:

An assessment of current land use at all sites has been made through reference to aerial mapping and the use of Google Maps⁵⁶.

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

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

⁵⁵ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁵⁶ Google Maps (no date) Available at: <https://www.google.co.uk/maps> [Date Accessed: 05/01/22]

3 Spatial Options

3.1 Summary of the SA of Spatial Options

3.1.1 MSDC has identified two reasonable alternative Spatial Options in relation to the distribution of the development proposed in the DPR. **Table 3.1** provides a summary description of the Spatial Options.

Table 3.1: Mid Sussex Spatial Options

Spatial Option	Description of Spatial Option
Option 1	Maintain the existing spatial strategy set out in Policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.
Option 2	Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.

3.1.2 Lepus Consulting has assessed the sustainability performance of each of the Spatial Options, as identified by MSDC. A summary of the assessment scores and findings are provided in **Table 3.2** and summarised below. The full assessment narrative is provided in **Appendix B**.

3.1.3 In order to identify the best performing option, no attempt should be made to sum the different SA ‘scores’ across each SA Objective since they are intrinsically different and not directly comparable.

Table 3.2: Summary assessments of potential impacts of the spatial options

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

- 3.1.4 The SA assesses the potential social, environmental and economic effects of the plan or proposal, when considered against other reasonable alternative options. It should be noted that whilst every effort has been made to predict likely effects, the potential sustainability impacts of each Spatial Option have been assessed at a high level and are reliant upon the current understanding of the baseline. Furthermore, the Spatial Options provide broad indications of where growth could be delivered, and do not define specific land parcels or locations for development. The assessments consider the likely overall impacts of development in these growth areas. The assessments have been informed by baseline information provided by MSDC, as well as professional judgement.
- 3.1.5 SA Objectives 1 to 4 summarise the predicted effects of the Spatial Options in relation to social sustainability issues. Spatial Option 2 performs well, and gives greater certainty, in relation to the delivery of housing to meet the identified need. As the locations of the proposed growth points or urban extensions is unknown at this stage of the assessment, there is greater uncertainty in relation to some aspects of the assessments including new residents' access to some healthcare services, access to secondary schools and impacts on community cohesion. Spatial Option 1 would be more likely to locate new residents in proximity to existing services and community facilities, however, MSDC has expressed uncertainty as to whether there are sufficient suitable sites (when assessing overall performance against all criteria) to meet this Spatial Option. Where housing needs cannot be met in the local area, there can be longer term, indirect social impacts, such as increasing house prices and rental prices, lack of affordable housing, impacts on community cohesion and quality of life.
- 3.1.6 SA Objectives 5 to 12 summarise the predicted effects of the Spatial Options in relation to environmental sustainability issues. Allowing for the limitations of this high level assessment, both Spatial Options are likely to perform similarly against SA Objectives relating to flooding and surface water, natural resources, biodiversity, energy and waste and water resources. Spatial Option 2 performs marginally better in relation to potential impacts on cultural heritage, as heritage assets in the district are often associated within existing settlements; a growth point in a more rural location may create the opportunity to minimise adverse impacts on heritage. The impacts of development on cultural heritage assets can be positive or adverse and are highly dependent on the design and layout of development and, therefore, there is uncertainty in the assessment of these effects. Spatial Option 2 also seeks to limit growth in designated landscapes, including the High Weald AONB and the setting to the South Downs National Park, and may serve to reduce impacts on these designated landscapes in comparison to Option 1. Spatial Option 2 performs less well against the climate change and transport objective as new residents are more likely to be located greater distances existing services, facilities and sustainable transport choices and are more likely to be dependent on private car use, with associated increases in GHG emissions. However, dependent on the sites selected for allocation, there is potential to provide new services and facilities alongside housing development which would benefit existing residents, particularly in areas which currently have limited access to such facilities within walking distance.

- 3.1.7 Spatial Option 1 would be more likely to deliver housing growth in locations which would help to support existing businesses located in the main centres, supporting the vitality and viability of these town and village centres and supporting town centre regeneration. While Spatial Option 2 does not specify the location of the growth point/s, this Spatial Option is more likely to deliver development in a more rural location, such development may support the businesses in the associated nearby settlement/s, potentially reducing footfall in the main centres.
- 3.1.8 Overall, Spatial Option 1 performs better in relation to some aspects of social and economic sustainability; however, there is uncertainty in the deliverability of identified housing need and this may lead to adverse social impacts in the long term. Spatial Option 2 provides greater certainty in relation to the delivery of the identified housing need. This Option also performs better in relation to some aspects of environmental sustainability, however, there is the potential for a new point/s to lead to greater need to travel to meet daily needs and fewer sustainable travel choices, with associated increases in GHG emissions and impacts on climate change. Further, detailed site assessment work would be required to define the likely nature and level of these impacts and the potential strategies to mitigate adverse effects. The conclusions at this stage are therefore uncertain and will be dependent on the sites proposed for allocation, the associated infrastructure and other policy mitigation or requirements

4 Site Assessments

4.1 Preface

- 4.1.1 MSDC has identified 42 reasonable alternative sites where residential or mixed use development may be considered for allocation in the District Plan Review. The 42 reasonable alternatives have been identified by the Council following assessment of approximately 260 sites against a Site Selection methodology which rejects sites that the Council deems unsuitable based on evidence.
- 4.1.2 The SA assessments of the sustainability performance of the 42 reasonable alternative sites are provided in **Appendix C**.
- 4.1.3 Each appraisal includes an SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. Pre-mitigation assessments consider the potential impacts of the allocation of the site without the mitigating influence of the draft District Plan policies. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 4.1.4 The 42 reasonable alternative sites identified by MSDC and assessed in this SA are set out in **Table 4.1**.

Table 4.1: Reasonable alternative site references and addresses

Site Reference	Site Address	Settlement
13	Land west of Kemps, Hurstpierpoint	Hurstpierpoint
18	Crabbet Park, Old Hollow, Near Crawley	Copthorne
19	Land east of College Lane, Hurstpierpoint	Hurstpierpoint
198	Land off West Hoathly Road, East Grinstead	East Grinstead
210	Land rear of 2 Hurst Road (Land opposite Stanford Avenue) Hassocks	Hassocks
503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	Lindfield
508	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	Haywards Heath
526	Land east of Paynesfield, Bolney	Bolney
543	Land West of London Road (north), Bolney	Bolney
556	Land east of Borde Hill Lane, Haywards Heath	Haywards Heath
573	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill
575	Land north east of Hurstpierpoint	Hurstpierpoint
601	Land at Coombe Farm, London Road, Sayers Common	Sayers Common
617	Land at Foxhole Farm, Bolney	Bolney
631	Challoners, Cuckfield Road, Ansty	Ansty
678	Broad location West of A23	Twineham
686	Land to the rear of The Martins (south of Hophurst Lane), Crawley Down	Crawley Down
688	Land to west of Turners Hill Road, Crawley Down	Crawley Down
736	Land at Ansty Farm, Cuckfield Road, Ansty	Ansty
740	Broad location to the West of Burgess Hill	Burgess Hill
743	Hurst Farm, Turners Hill Road, Crawley Down	Crawley Down

Site Reference	Site Address	Settlement
784	Extension to allocated Land at Bolney Road, Ansty	Ansty
789	Phase 1 Swallows Yard, London Road, Albourne	Albourne
799	Land south of Reeds Lane, Sayers Common	Sayers Common
830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	Sayers Common
844	Land at North Colwell Farm, Lewes Road, Haywards Heath	Haywards Heath
858	Land at Hurstwood Lane, Haywards Heath	Haywards Heath
984	The Paddocks Lewes Road Ashurst Wood	Ashurst Wood
986	Land to the West of Albourne Primary School Henfield Road Albourne	Albourne
1003	Land to South of LVS Hassocks, London Road, Sayers Common	Sayers Common
1018	Extension south west of Meadow View, Sayers Common	Sayers Common
1020	Ham Lane Farm House, Ham Lane Scaynes Hill	Scaynes Hill
1022	Former Hassocks Golf Club, London Road, Hassocks	Hassocks
1026	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	Sayers Common
1030	Land at Hillbrow, Janes Lane, Burgess Hill	Burgess Hill
1063	Phase 2 Swallows Yard, London Road Albourne	Albourne
1075	Land north of Willow way and Talbort Mead, Cuckfield Road Road Hurstpierpoint	Hurstpierpoint
1095	Land at West Town Farm Hurstpierpoint	Hurstpierpoint
1105	Land east and west of Malthouse Lane	Burgess Hill
1120	Land east of Foxhole Lane	Bolney
1121	Orchards Shopping Centre	Haywards Heath
1123	Burgess Hill Station	Burgess Hill

4.2 Overview of site assessments pre-mitigation

4.2.1 The impact matrices for all reasonable alternative site assessments pre-mitigation are presented in **Table 4.2**. This table summarises the ‘worst case scenario’ impact per SA Objective, as explained within **paragraph 2.6.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C**, which are presented with impacts per receptor within each SA Objective, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 4.2: Impact matrix of the 42 reasonable alternative sites pre-mitigation

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community and Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
13	+	-	-	++	-	-	0	-	-	-	-	0	++	+
18	++	-	--	-	--	--	--	-	-	-	--	-	-	++
19	+	-	--	-	--	-	0	-	-	-	-	0	-	+
198	+	-	-	-	+	-	-	--	0	-	-	-	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
210	+	-	++	+	+	-	0	-	0	-	-	0	+	+
503	++	-	--	-	-	--	--	-	-	-	--	0	-	-
508	+	-	--	-	-	-	0	-	0	-	-	0	-	+
526	+	-	-	-	+	-	0	-	-	-	-	0	-	+
543	+	-	-	-	+	-	0	-	0	-	-	0	-	+
556	+	-	-	-	--	-	-	-	-	-	-	-	-	+
573	+	-	++	-	+	-	0	-	0	-	-	0	-	+
575	++	-	--	-	--	--	--	-	-	-	--	-	-	+
601	++	-	--	-	--	-	--	-	-	-	--	0	-	+
617	++	-	-	-	-	-	0	-	-	-	--	0	-	+
631	+	-	--	-	+	-	0	-	0	-	-	0	-	+
678	++	-	--	-	--	--	--	-	-	-	--	-	-	+
686	++	-	-	-	--	-	-	-	-	-	--	0	-	+
688	++	-	-	-	--	-	--	-	-	-	--	-	-	+
736	++	-	--	-	--	--	--	-	-	-	--	-	-	++
740	++	-	0	-	--	--	--	-	0	-	--	-	-	++
743	+	-	-	-	--	-	-	-	0	-	-	0	-	-
784	+	-	--	-	+	-	0	-	0	-	-	0	-	+
789	+	-	-	-	+	-	0	-	-	-	-	0	-	+
799	++	-	-	-	--	--	0	-	-	-	--	0	-	++
830	++	-	--	-	--	-	0	--	0	-	--	-	-	+
844	++	-	-	-	-	-	-	-	-	-	--	0	-	+
858	+	-	--	-	+	-	-	-	0	-	-	0	-	+
984	+	-	-	-	+	-	-	-	0	-	-	0	-	+
986	++	-	-	-	--	-	-	-	-	-	--	0	-	+
1003	++	-	--	-	--	-	0	-	0	-	--	-	-	+
1018	++	-	-	-	--	-	0	-	0	-	--	0	-	+
1020	+	-	-	-	-	-	-	-	0	-	-	0	-	+
1022	++	-	--	-	--	--	--	-	-	-	--	-	-	-
1026	+	-	-	-	--	-	0	-	0	-	-	0	-	+
1030	+	-	-	-	+	-	-	-	0	-	-	-	-	+
1063	+	-	-	-	+	-	0	-	-	-	-	0	-	+
1075	++	-	-	-	--	-	-	-	-	-	--	-	-	+
1095	++	-	-	-	--	--	-	-	-	-	--	-	-	+
1105	++	-	--	-	--	--	-	-	-	-	--	-	-	+
1120	++	-	-	-	-	-	0	-	-	-	--	0	-	+
1121	++	+	++	++	-	+	-	-	0	++	--	0	+	-
1123	++	-	++	++	-	-	-	+	0	++	--	0	+	-

5 Policy Assessments

5.1 Preface

5.1.1 **Table 5.1** lists the Mid Sussex DPR draft policies. The sustainability performance of these policies is set out in **Appendix D**.

Table 5.1: The 56 draft MSDPR policies

Policy number	Policy Name
Sustainability	
DPS1	Climate Change
DPS2	Sustainable Design and Construction
DPS3	Renewable and Low Carbon Energy Schemes
DPS4	Flood Risk and Drainage
DPS5	Water Infrastructure and the Water Environment
DPS6	Health and Wellbeing
Natural Environment and Green Infrastructure	
DPN1	Biodiversity, Geodiversity and Nature Recovery
DPN2	Biodiversity Net Gain
DPN3	Green infrastructure
DPN4	Trees, Woodland and Hedgerows
DPN5	Historic Parks and Gardens
DPN6	Pollution
DPN7	Noise Impacts
DPN8	Light Impacts and Dark Skies
DPN9	Air Quality
DPN10	Land Stability and Contaminated Land
Countryside	
DPC1	Protection and Enhancement of Countryside
DPC2	Preventing Coalescence
DPC3	New Homes in the Countryside
DPC4	High Weald Area of Outstanding Natural Beauty
DPC5	Setting of the South Downs National Park
DPC6	Ashdown Forest SPA and SAC
Built Environment	
DPB1	Character and Design
DPB2	Listed Buildings and Other Heritage Assets
DPB3	Conservation Areas
Transport	
DPT1	Placemaking and Connectivity
DPT2	Rights of Way and Other Recreational Routes
DPT3	Cycling
DPT4	Parking and Electric Vehicle Charging Infrastructure
Economy	
DPE1	Sustainable Economic Development

Policy number	Policy Name
DPE2	Existing Employment Sites (SA34)
DPE3	Employment Allocations
DPE4	Town and Village Centres
DPE5	Within Town and Village Centre Boundaries
DPE6	Within Primary Shopping Areas
DPE7	Sustainable Rural Development and the Rural Economy
DPE8	Sustainable Tourism and the Visitor Economy
Housing	
DPH1	Housing
DPH2	Sustainable Development - Outside the Built Up Area
DPH3	Sustainable Development - Inside Built Up Area
DPH4	General Principles for Housing Allocations
DPH26	Older Persons Housing and Specialist Accommodation
DPH29	Gypsies, Travellers and Travelling Showpeople
DPH30	Self and Custom Build
DPH31	Housing Mix
DPH32	Affordable Housing
DPH33	First Homes
DPH34	Rural Exception Sites
DPH35	Dwelling Space Standards
DPH36	Accessibility
Infrastructure	
DPI1	Securing Infrastructure
DPI2	Planning Obligations
DPI3	Major Infrastructure Projects
DPI4	Communications Infrastructure
DPI5	Open Space, Sport and Recreational Facilities
DPI6	Community and Cultural Facilities and Local Services
Note: Site allocations policies, in agreement with MSDC, have not been assessed at this stage for the purposes of this draft SA.	

5.2 Overview of policy assessments

5.2.1 The impact matrices for all policy assessments are presented in **Table 5.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D**, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 5.2: Impact matrix of the 56 draft MSDPR policies

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
Sustainability														
DPS1	0	+	0	0	+	+	+	0	0	++	+	+	0	0
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0
DPS3	0	0	0	0	0	+	-	-	0	0	++	0	0	0
DPS4	0	0	0	0	++	0	+	+	0	0	0	+	0	0
DPS5	0	+	0	0	0	0	+	0	0	0	0	++	0	0
DPS6	0	++	+	++	+	0	+	+	0	+	0	0	+	+
Natural Environment and Green Infrastructure														
DPN1	0	+	0	0	+	+	++	+	0	+	0	+	0	0
DPN2	0	+	0	0	+	+	++	0	0	+	0	+	0	0
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0
DPN4	-	+	0	0	+	+	++	+	+	+	0	+	0	0
DPN5	0	0	0	0	0	0	+	+	+	0	0	0	0	0
DPN6	0	+	0	0	0	+	+	0	0	0	0	+	0	0
DPN7	0	+	0	0	0	0	+	+	+	0	0	0	0	0
DPN8	0	+	0	0	0	0	+	+	+	0	0	0	0	0
DPN9	0	+	0	0	0	0	+	0	0	+	0	0	0	0
DPN10	0	+	0	0	0	+	+	0	0	0	0	+	0	0
Countryside														
DPC1	0	+	0	0	0	+	+	+	+	0	0	0	0	0
DPC2	0	0	0	+	0	+	0	++	+	0	0	0	0	0
DPC3	+	0	0	0	0	0	0	+	+	0	0	0	0	+
DPC4	-	0	0	+	0	0	+	++	+	0	0	0	0	+
DPC5	-	0	0	0	0	0	+	++	0	0	0	0	0	0
DPC6	0	+	0	0	0	0	+	+	0	+	0	0	0	0
Built Environment														
DPB1	0	+	0	++	+	+	+	+	+	+	+	0	0	0
DPB2	0	0	0	0	0	0	0	+	++	0	0	0	0	0
DPB3	0	0	0	0	0	0	0	+	+	0	0	0	0	0
Transport														
DPT1	0	+	0	+	0	0	0	0	0	+	0	0	0	+
DPT2	0	+	0	0	0	0	0	+	0	+	0	0	0	0

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
DPT3	0	+	0	+	0	0	0	0	0	+	0	0	0	0
DPT4	0	0	0	0	0	0	0	0	0	+	0	0	0	0
Economy														
DPE1	0	0	0	+	-	-	-	-	-	0	-	-	++	++
DPE2	0	0	0	0	-	-	-	-	-	0	-	-	++	++
DPE3	0	+	0	+	-	-	-	-	-	-	-	-	+	+
DPE4	0	+	0	+	0	0	0	0	0	0	0	0	+	+
DPE5	0	0	0	+	0	0	0	0	0	0	0	0	+	0
DPE6	+	+	0	+	0	0	0	+	0	0	0	0	+	0
DPE7	0	+	0	0	0	0	0	0	0	+	0	0	+	0
DPE8	0	+	0	0	0	0	0	0	+	+	0	0	+	+
Housing														
DPH1	++	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0
DPH2	+	0	0	+	0	-	0	+	0	0	0	0	+	+
DPH3	+	0	0	+	0	+	0	+	0	+	0	0	+	+
DPH4	++	++	+	++	++	+	++	++	++	++	++	++	+	+
DPH26	+	+	0	+	0	0	0	+	0	+	0	0	0	0
DPH29	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH30	+	0	0	0	0	0	0	+	0	0	0	0	0	0
DPH31	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH32	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH33	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH34	+	0	+	0	0	-	0	+	0	+	0	0	0	0
DPH35	0	+	0	0	0	0	0	0	0	0	0	0	0	0
DPH36	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Infrastructure														
DPI1	0	+	+	+	+	0	0	+	0	+	+	+	+	+
DPI2	0	+	+	+	+	0	+	+	0	+	+	0	0	0
DPI3	0	+	+	0	+	0	0	0	0	+	+	0	+	+
DPI4	0	0	0	0	0	+	0	0	0	+	0	0	+	+
DPI5	0	+	0	+	0	0	+	+	0	0	0	0	0	0
DPI6	0	+	0	+	0	0	0	0	0	0	0	0	0	+

5.3 Summary of policy assessments

- 5.3.1 Many of the policy assessments have identified minor positive or negligible impacts in relation to sustainability.
- 5.3.2 DPH1 is the only policy where the assessment has identified major negative impacts. DPH1 is a strategic policy setting out the total level of housing need anticipated to be delivered both during the plan period as well as the element delivered as part of the DPR. The identified adverse impacts are associated with a significant loss of soil resources and potential adverse impacts on landscape character as a result of the development overall.
- 5.3.3 The policy also identifies a range of uncertain impacts, due to the varying scale and location of the proposed development which would be expected to result in a mixture of positive and negative impacts under SA Objectives ‘Health and Wellbeing’ (SA Objective 2) and ‘Community and Crime’ (SA Objective 4).
- 5.3.4 At the time of writing this report, the potential impact of the proposed development on Habitats sites, such as Ashdown Forest SAC and SPA, is uncertain. The emerging HRA will provide analysis of the likely impacts, the identification of impact pathways and mitigation measures.
- 5.3.5 The majority of the other policies set out requirements for development proposals which ultimately seek to protect the natural and built environment and ensure there is sufficient social infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix, protecting designated sites, such as the High Weld AONB, the setting to the South Downs National Park and sites designated for their biodiversity interest. As these policies seek to protect existing assets or enhance the provision of these features, minor positive impacts have largely been identified.
- 5.3.6 Overall, the policies set out a suite of requirements which would be likely to help avoid potential impacts, and where necessary, mitigate adverse effects. The likely mitigating effects of the 56 draft policies are set out in **Appendix E** and recommendations to further improve the performance of the policies is set out **section 5.4**.

5.4 Recommendations

5.4.1 Recommendations to help improve the sustainability performance of the draft MSDPR policies have been listed in **Table 5.3**.

Table 5.3: Recommendations for improvements to the draft Mid Sussex DPR policies

SA Objective	Recommendations	Council comments
1. Housing	<ul style="list-style-type: none"> Support proposals that facilitate remote/home working. For example, in relation to ensuring suitable broadband connections and in relation to the internal layout of dwellings. Greater home working reduces the need to travel, reduces congestion and traffic-related emission of GHGs and other pollutants. 	<p>Policy DPI4: Communications Infrastructure encourages high quality digital infrastructure including fibre to new housing. This will ensure new homes support home working and reduce the need to travel.</p> <p>Policy DPT1: Placemaking and Connectivity ensures that new streets are designed to incorporate advanced digital infrastructure, including fibre, to improve digital connectivity and facilitate home working. This reflects the aims of the Council's adopted Sustainable Economy Strategy to develop digital infrastructure.</p> <p>Policy DPE1: Sustainable Economic Development also seeks appropriate infrastructure to support business growth, including advanced digital infrastructure.</p>
2. Health and Wellbeing	<ul style="list-style-type: none"> Consider commissioning a Green Infrastructure Strategy as part of the Evidence Base to inform the protection and provision of a network of green and blue infrastructure and the multiple benefits it can deliver, including in relation to mental and physical health. Consider using policy tools to set out the quantitative and qualitative requirements for informal/natural green space/green infrastructure in new developments, for example, using Natural England's Accessible Natural Greenspace Standard. Consider enhancing policies relating to air pollution to seek to improve air quality across the district. 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets. Policy DPS6: Health and Wellbeing and DPS1: Climate Change emphasise the importance of green infrastructure and require development to incorporate green infrastructure in order to secure the multiple benefits of green infrastructure.</p> <p>The draft Play & Amenity Green Space Study considers quantitative and qualitative standards for green space.</p> <p>Policy DPN9: Air Quality builds upon existing air quality policy and refers to the Council's air quality guidance and related Air Quality Action Plan.</p> <p>Site proposals within the District Plan are tested through Air Quality modelling to ensure no adverse impacts on the existing AQMA and Ashdown Forest SAC in adjoining Wealden district.</p>
3. Education	<ul style="list-style-type: none"> Provide policy support for the need to deliver sustainable transport 	<p>The District Plan strategy is based around the 20-minute neighbourhood principle,</p>

SA Objective	Recommendations	Council comments
	<p>choices to access primary and secondary schools.</p>	<p>selecting growth locations based on the ability for communities to access facilities (such as schools) by active travel rather than by private car. This includes provision of new educational facilities on significant sites (over 1,000 dwellings).</p> <p>Policy DPT3: Active Travel provides the requirement for development to create healthy environments in which people choose to walk and wheel. This includes provision of active travel infrastructure and facilities such as cycle parking.</p>
<p>4. Community and Crime</p>	<ul style="list-style-type: none"> No further recommendations. 	
<p>5. Flooding</p>	<ul style="list-style-type: none"> No further recommendations. 	
<p>6. Natural Resources</p>	<ul style="list-style-type: none"> To protect the soil resource, where possible provide open space or green infrastructure, such as community orchards and allotments, in areas of BMV land within a site boundary. 	<p>Several policies seek to protect soil including DPS1: Climate Change; DPS2: Sustainable Design and Construction; DPN1: Biodiversity, Geodiversity and Nature Recovery; DPN3: Green Infrastructure; DPN6: Pollution; DPN10: Land Stability and Contaminated Land; DPC1: Protection and Enhancement of the Countryside; and DPC4: High Weald Area of Outstanding Natural Beauty.</p> <p>The policies seek to protect soil health and prevent its degradation through the results of development. BMV land will be protected and soil is also valued for its contribution to carbon storage, biodiversity and nature recovery.</p>
<p>7. Biodiversity</p>	<ul style="list-style-type: none"> Consider commissioning a Green Infrastructure Strategy as part of the Evidence Base to inform the protection and provision of a network of green and blue infrastructure and the multiple benefits it can deliver, including in relation to enhancing biodiversity and facilitating resilience and adaptation to a changing climate. Improve the resilience of the ecological network through increased quantity of habitat and enhanced habitat connectivity, through an evidenced landscape scale approach, for example, 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets.</p> <p>Policy DPS1: Climate Change emphasises the importance of green infrastructure in contributing to mitigating the effects of climate change.</p> <p>Policies DPS1: Climate Change; DPS6: Health and Wellbeing; and DPN1: Biodiversity, Geodiversity and Nature Recovery emphasise the importance of biodiversity, green infrastructure and nature-based solutions requiring development to incorporate such features in order to secure</p>

SA Objective	Recommendations	Council comments
	<p>through preparation of an ecological network map or cross referencing to the evidence provided in the Local Nature Recovery Map.</p> <ul style="list-style-type: none"> Ensure policy recognises the multiple benefits of natural capital and ecosystem services, such as health and wellbeing, mitigation of extreme weather, water management, improvements to air quality, amongst others. 	<p>the multiple benefits of natural capital and ecosystem services.</p> <p>Policy DPN1: Biodiversity, Geodiversity and Nature Recovery and Policy DPN2: Biodiversity Net Gain refer to nature recovery. Proposals should align with the forthcoming Local Nature Recovery Strategy and other relevant strategies. Work is ongoing to map the ecological network and habitats in Mid Sussex District.</p>
8. Landscape	<ul style="list-style-type: none"> Policies should aim to protect areas identified as tranquil. An example method for identifying tranquillity include ‘Mapping Tranquillity’⁵⁷. 	<p>Policy DPN7: Noise Impacts protects areas valued for tranquillity, including designated landscapes.</p> <p>Policies DPC4: High Weald Area of Outstanding Natural Beauty and DPC5: Setting of the South Downs National Park identify tranquillity as a key characteristic of protected landscapes.</p>
9. Cultural Heritage	<ul style="list-style-type: none"> DPB2: Listed Buildings and Other Heritage Assets. Consider amending wording relating to ‘Other Heritage Assets’ to be “conserve or enhance” heritage assets” rather than “conserve”. Consider amending wording to bring out the opportunity to enhance the public understanding and enjoyment of heritage assets. 	
10. Climate Change and Transport	<ul style="list-style-type: none"> Consider commissioning a Green Infrastructure Strategy to inform the protection and provision of a range of multifunctional green and blue infrastructure types alongside development throughout the Plan period. 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets.</p>
11. Energy and Waste	<ul style="list-style-type: none"> The requirement to meet BREEAM ‘excellent’ or ‘outstanding’ for residential and non-residential development should lead to greater energy efficiency and reductions in construction and operational waste 	<p>DPS2: Sustainable Design and Construction seeks development to achieve Home Quality Mark and BREEAM standards (minimum dependant on size). Seeking tighter standards than Building Regulations will need significant evidence and viability</p>

⁵⁷ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date Accessed: 28/09/22]

SA Objective	Recommendations	Council comments
	<p>generation. Consider also explicitly setting higher standards than required by the Building Regulations⁵⁸ to work towards achieving zero carbon development.</p> <ul style="list-style-type: none"> • Publish evidence on and respond to the relevant recommendations in the future report on reducing GHG emissions across the plan area. • Consider local partnerships to establish locally appropriate solutions to the climate adaption and mitigation. 	<p>testing but will be investigated as the plan progresses.</p> <p>Evidence on reducing GHG emissions is being prepared as part of the Council's overall strategy for achieving Net Zero.</p>
<p>12. Water Resources</p>	<ul style="list-style-type: none"> • No further recommendations. 	
<p>13. Economic Regeneration</p>	<ul style="list-style-type: none"> • No further recommendations. 	
<p>14. Economic Growth</p>	<ul style="list-style-type: none"> • No further recommendations. 	

⁵⁸ MHCLG (2016) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 31/01/22]

6 Site assessments post-mitigation

6.1 Overview

6.1.1 The impact matrices for all reasonable alternative site assessments post-mitigation are presented in **Table 6.1**. These impacts should be read in conjunction with **Appendix E**, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 6.1: Impact matrix of the 42 reasonable alternative sites post-mitigation

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change and Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
13	+	-	0	++	+	-	+/-	-	-	++	0	0	++	+
18	++	-	-	-	-	--	-	-	-	-	-	0	-	++
19	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
198	+	0	0	0	+	-	-	--	0	-	0	0	-	+
210	+	-	++	++	+	-	+/-	-	0	-	0	0	++	+
503	++	0	-	-	+	--	-	-	0	-	-	0	-	+
508	+	0	-	0	+	-	+/-	-	0	-	0	0	+	+
526	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
543	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
556	+	0	0	+	-	-	-	-	0	-	0	0	-	+
573	+	-	++	0	+	-	+/-	-	0	-	0	0	-	+
575	++	-	-	-	+	--	-	-	-	-	-	0	-	+
601	++	-	-	-	+	-	-	-	0	-	-	0	-	+
617	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
631	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
678	++	-	-	-	-	--	-	-	0	-	-	0	-	+
686	++	0	0	0	+	-	-	-	0	-	-	0	-	+
688	++	-	0	-	+	-	-	-	0	-	-	0	-	+
736	++	-	-	-	-	--	-	-	0	-	-	0	-	++
740	++	-	0	-	-	--	-	-	0	-	-	0	-	++
743	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
784	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
789	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
799	++	-	0	-	+	--	+/-	-	-	-	-	0	-	++
830	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
844	++	-	0	0	+	-	+/-	-	0	-	-	0	-	+
858	+	0	-	-	+	-	-	-	0	-	0	0	-	+
984	+	-	0	+	+	-	-	--	0	-	0	0	-	+
986	++	-	0	-	+	-	-	-	0	-	-	0	-	+

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change and Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
1003	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
1018	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1020	+	0	0	0	+	-	+/-	-	0	-	0	0	-	+
1022	++	-	-	-	+	--	-	-	0	-	-	0	-	+
1026	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
1030	++	0	0	+	+	-	0	-	0	-	0	0	-	+
1063	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
1075	++	-	0	++	+	-	-	-	0	-	-	0	-	+
1095	++	-	0	-	+	--	-	-	0	-	-	0	-	+
1105	++	-	-	-	-	--	-	-	0	-	-	0	-	+
1120	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1121	++	++	++	++	+	+	0	-	0	++	-	0	++	+
1123	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+

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7 Next steps

7.1 Consultation on the Regulation 18 SA Report

7.1.1 This Regulation 18 SA Report will be subject to consultation alongside the consultation draft (Regulation 18) Mid Sussex District Plan Review 2021 – 2039.

7.1.2 This report represents the latest stage of the SA process to accompany the Mid Sussex DPR. The SA process will take on-board any comments on this report and use them to inform the next stage in the SA process, as appropriate.

7.2 Responding to the consultation

7.2.1 This Regulation 18 SA Report will be published by the MSDC for consultation. Consultation findings will be used to inform subsequent stages of the SA process.

7.2.2 All responses on this consultation exercise should be sent to:

Mid Sussex District Council

Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Tel: 01444 477053

Email: PolicyConsultation@midsussex.gov.uk

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Appendix A: Mid Sussex Local Plan Regulation 19 SA Framework

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
1	Housing To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	1.1. Meet the housing requirement of the whole community, including of older people? 1.2. Deliver a range of type, tenures and mix of homes the District needs over the plan period? 1.3. Increase the supply of affordable homes? 1.4. Provide for the housing need of an ageing population? 1.5. Meet Gypsy and Traveller accommodation needs?	<ul style="list-style-type: none"> • Housing completions (net) • Affordable housing completions (gross) • Affordable housing contributions received • Number of households on the housing needs register • Number of households accepted as full homeless • House price to earnings ratio • Net additional Gypsy and Traveller pitches • Number of C2 provision
2	Health and wellbeing To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	2.1. Provide for additional facilities to support the need of new and growing communities? 2.2. Improve access to health care facilities and social care services? 2.3. Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure, and recreation and sport facilities? 2.4. Promote healthy lifestyle choices by encouraging and facilitating walking and cycling? 2.5. Support special needs and an ageing population? 2.6. Increase access to leisure and open space facilities including in the countryside? 2.7. Provide a range of play space for children and young people?	<ul style="list-style-type: none"> • Number of applications resulting in new, extended or improved health facilities • Number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital • Number of households within 300m of leisure and open space facilities (as defined in the Open Space study) • Hectares of accessible open space per 1,000 population • Financial contributions towards leisure facilities received • Financial contributions towards health received • Amount of additional community facilities delivered • Percentage of population not in good health
3	Education To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.	3.1. Improve qualifications and skills of young people and adults? 3.2. Provide an adequate range of education and childcare facilities? 3.3. Contribute to meeting primary, secondary and post 19 education needs?	<ul style="list-style-type: none"> • Percentage of population of working age qualified to at least NVQ level 3 (or equivalent) • Percentage of adults with poor literacy and numeracy skills • Number of households within a 15 minute walk (approx. 1.2km) from a Primary School

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
4	<p>Community and crime To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.</p>	4.1. Reduce crime/fear of crime and anti-social activity? 4.2. Promote design that discourages crime? 4.3. Promote sustainable mixed use environments? 4.4. Improve access to community facilities? 4.5. Maintain existing community facilities and encourage the delivery of new ones?	<ul style="list-style-type: none"> • All crime – number of crimes per 1000 residents per annum • Number of domestic burglaries per 1,000 households • Number of dwellings permitted more than 150m from a built-up area boundary • Number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library) • Number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc.)
5	<p>Flooding and surface water To reduce the risk to people, properties, the economy and the environment of flooding from all sources</p>	5.1. Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? 5.2. Promote the use of Natural Flood Management schemes, SuDS and flood resilient design? 5.3. Incorporate sustainable design and construction techniques?	<ul style="list-style-type: none"> • Percentage of the District that is within Flood Zone 2/Flood Zone 3 • Number of properties at risk from flooding, as defined by the Environment Agency • Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds • Number of developments with sustainable drainage systems
6	<p>Natural resources To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.</p>	6.1. Support the redevelopment of previously developed land? 6.2. Make best use of land? 6.3. Encourage the construction of more sustainable homes? 6.4. Minimise the loss of open countryside to development? 6.5. Minimise the loss of the best and most versatile agricultural land to development? 6.6. Maintain and enhance soil quality?	<ul style="list-style-type: none"> • Percentage of new and converted homes developed on brownfield land • Percentage of new employment floorspace on previously developed land • Average density of new housing developments • Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development • Amount of empty homes

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
7	<p>Biodiversity and geodiversity To conserve and enhance the District's biodiversity and geodiversity</p>	<p>7.1. Avoid adverse effects on internationally and nationally designated biodiversity and geodiversity assets within and outside the District? 7.2. Avoid adverse effects on locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland? 7.3. Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change? 7.4. Provide and manage the opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?</p>	<ul style="list-style-type: none"> • Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District • Area of ancient woodland within the District • Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar) • Number of planning applications approved contrary to advice given by Natural England on biodiversity issues • Number of dwellings permitted within the 7km Zone of Influence (SPA) • Capacity of Suitable Accessible Natural Greenspace (SANG) • Net gain in biodiversity
8	<p>Landscape To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.</p>	<p>8.1. Conserve and enhance the High Weald AONB? 8.2. Conserve and enhance the settings of the South Downs National Park? 8.3. Protect and enhance settlements and their settings within the landscape across the district? 8.4. Protect and enhance landscape character? 8.5. Promote high quality design in context with its rural and urban landscape? 8.6. Maintain and where possible increase accessibility to the countryside and more generally to open spaces?</p>	<ul style="list-style-type: none"> • Open spaces managed to green flag standard • Number of applications approved contrary to advice from the High Weald AONB unit or the South Downs National Park Authority • Amount of new development (units) within the High Weald AONB • Number of households within 300m of multi- functional green space (as defined in the Mid Sussex Assessment of Open Space) • Hectares of accessible open space per 1000 population. • Amount of rights of way • Number of new dwellings approved on low/negligible sites in the Plan Area as identified in the Landscape Capacity Study
9	<p>Cultural heritage To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>	<p>9.1. Protect, enhance and restore buildings, monuments, sites, places, areas and landscape of heritage interest or cultural value (including their setting) meriting consideration in planning decisions? 9.2. Protect and enhance sites, features and areas of archaeological value in both urban and rural areas? 9.3. Reduce the number of buildings at risk? 9.4. Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies? 9.5. Enhance accessibility to cultural heritage assets?</p>	<ul style="list-style-type: none"> • Number of Listed Buildings in the District • Number of Conservation Areas in the District • Number of Conservation Areas with appraisals and management proposal • Number of heritage assets recorded as 'at risk'

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
10	<p>Climate change and transport The reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p>	<p>10.1. Develop more efficient land use patterns that minimise the need to travel by car through the location and design of new development and place which provide more opportunities for active travel for the provision and link to public transport infrastructure? 10.2. Reduce CO2 emissions to contribute to identified national targets? 10.3. Improve accessibility to work and services by public transport, walking and cycling? 10.4. Protect and improve air quality? 10.5. Avoid exacerbating existing air quality issues in designated AQMAs? 10.6. Achieve a healthy living environment?</p>	<ul style="list-style-type: none"> • Car ownership • Number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour) • Number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour) • Number of households within a 15 minute walk (approx. 1.2km) of a train station • Proportion of journeys to work other than by car • Percentage of residents living and working within Mid Sussex • Monetary investment in sustainable transport schemes (value of s.106 agreements) • Number of Air Quality Management Areas (AQMAs) within the District • Change in CO2 emissions from transport • Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore/town centre/high street shopping facilities) • Number of households within 30min by public transport, or 15min by walking or cycling journey time from a convenience store
11	<p>Energy and waste To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.</p>	<p>11.1. Reduce energy consumption? 11.2. Reduce wate generated per head of population? 11.3. Increase rate per head of population of waste reuse and recycling? 11.4. Encourage recycling (including building materials)? 11.5. Incorporate sustainable design and construction techniques?</p>	<ul style="list-style-type: none"> • Domestic energy consumption per household • Number of renewable energy installations within Mid Sussex • Installed capacity of renewable energy installations within Mid Sussex • Domestic waste produced per head of population • Percentage of domestic waste that has been recycled

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
12	<p>Water resources To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.</p>	12.1. Protect and enhance water resources? 12.2. Support the achievement of Water Framework Directive targets? 12.3. Promote sustainable use of water? 12.4. Maintain water availability or water dependant habitats? 12.5. Support the provision of sufficient water supply and treatment infrastructure? 12.6. Incorporate sustainable design and construction techniques?	<ul style="list-style-type: none"> • Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate" • Stretches of watercourse with no deterioration in Water Framework Directive status • Incidents of major and significant water pollution within the District • Number of planning applications approved contrary to advice given by the EA on water quality issues • Number of developments that minimise water consumption
13	<p>Economic regeneration To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.</p>	13.1. Protect key retail areas? 13.2. Encourage rural diversification? 13.3. Make land available for business development? 13.4. Increase the range of employment opportunities, shops and services available in the town centres across the district? 13.5. Decrease the number of vacant units in town centres? 13.6. Enhance the viability and vitality of the District's town centres? 13.7. Improve access to the District's town centres and services? 13.8. Enhance the local distinctiveness in the town centres? 13.9. Provide new or improved leisure, recreational or cultural activities? 13.10. Maintain or increase the amount of floorspace provided for town centre uses within the town centres?	<ul style="list-style-type: none"> • Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2) • Number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities) • Retail unit vacancy rate • Total amount of new commercial/business floorspace in rural areas • Number of vacant sites brought back into use in Town Centres • number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore/town centre/high street shopping facilities)

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
14	<p>Economic growth To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.</p>	14.1. Improve business development and enhance competitiveness? 14.2. Improve the resilience of business and the economy? 14.3. Promote growth in key sectors? 14.4. Reduce out commuting? 14.5. At least maintain and possibly improve employment rate across the District? 14.6. Increase the range of employment opportunities? 14.7. Facilitate the provision of good quality infrastructure to promote economic growth?	<ul style="list-style-type: none"> • Net increase/decrease in commercial (Use Classes E, B2, B8) and office (E) floorspace • Number of businesses within the District • Number of new businesses setting up in the District • Percentage of Mid Sussex residents who are employed • Percentage of Mid Sussex residents who are economically active • Average weekly income (gross) for those who are employed in the District • Percentage of residents living and working within Mid Sussex • Job density (ratio of jobs to working age population)

Appendix B: Reasonable Alternative Spatial Option Assessments

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B.1 SA of Spatial Options

B.1.1 Refining reasonable alternative spatial options

- B.1.1.1 Policies DP4 and DP6 of the adopted District Plan set out the current spatial strategy which informed the preparation of the Local Plan and the distribution of development. The strategy focused development towards the three main towns (Burgess Hill, East Grinstead and Haywards Heath, also called Category 1 settlements) and encouraged proportionate growth across the hierarchy of other settlements to meet local needs and support the provision of local services. One spatial option for the DPR would be to maintain the existing spatial strategy, referred to as Option 1.
- B.1.1.2 MSDC has considered a range of other options relating to the distribution of development across the district in order to meet the identified housing need in the DPR. Option 2 would be to support growth in more sustainable locations, including supporting development at existing settlements and seeking opportunities for urban extensions to improve the sustainability of existing settlements while also protecting designated landscapes, such as the High Weald AONB and the setting to the South Downs National Park.
- B.1.1.3 This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.
- B.1.1.4 An alternative approach to help to meet the identified housing need would be to support the development of a standalone new settlement. Whilst this may constitute a reasonable alternative option to consider, no deliverable site or sites have been presented to the Council. One potential location has been considered that would meet this spatial approach, known as ‘Mayfield Market Town’, which has been proposed for a 10,000 home mixed-use development with the majority (8,000 dwellings) within Horsham District. However, this site has been ruled out during the site selection process and is not considered to be deliverable, owing in part to a historic lack of support from Horsham District Council as well as water neutrality considerations.
- B.1.1.5 As such, the two identified Reasonable Alternative Spatial Options considered within this SA are set out in **Table B.1.1**.

Table B.1.1: Mid Sussex Spatial Options

Spatial Option	Description of Spatial Option
Option 1	Maintain the existing spatial strategy with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.
Option 2	Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.

B.1.1.6 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table B.1.2**. Full explanations and reasonings behind each overall ‘score’ outlined in **Table B.1.2** are set out by SA Objective in the following sections.

B.1.1.7 It should be noted that whilst every effort has been made to predict effects, the potential sustainability impacts of each Spatial Option have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by MSDC, as well as professional judgement.

B.1.1.8 MSDC has prepared a Scoping Report¹, which provides an overview of the baseline social, environmental and economic conditions in the district and identifies key sustainability issues. The issues identified in the Scoping Report have been used to inform this assessment, alongside further baseline data collated at this stage of the SA process, as described in the SA Main Report.

Table B.1.2: Summary assessments of potential impacts of the spatial options

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

B.1.2 SA Objective 1: Housing

B.1.2.1 Both of the alternative spatial strategies have the potential to meet identified housing needs, including the provision of affordable housing and different types and tenures of housing. Therefore, both alternatives could result in a significant positive impact on the delivery of housing.

¹ Mid Sussex District Council (November 2021) ‘District Plan Review: Sustainability Appraisal: Scoping Report’ Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed 11/01/22]

- B.1.2.2** Option 1 reflects the existing spatial strategy and would focus growth at the three main settlements and support proportionate growth across the other categories of settlements to meet local needs. This spatial strategy would support housing growth where the need arises. The Option could support the delivery of housing on a dispersed range of sites across the district and may be less dependent on the delivery of large strategic sites, where delivery may have a longer lead in times due to the complex nature of bringing forward strategic sites. However, much growth in the previous iteration of the Local Plan was focused around the three main towns and larger villages, and MSDC is aware that there is now less potential for additional growth in these locations. There is, therefore, substantial uncertainty in the availability of sites and therefore substantial uncertainty in meeting the identified housing needs, should this strategy be taken forward into the DPR.
- B.1.2.3** Where housing need cannot be met within the local authority area, there is the potential for long term indirect impacts to occur in relation to other social sustainability criteria. The lack of housing delivery may lead to increasing house prices and reduced quality of life as a greater proportion of household income is spent meeting accommodation needs. Lower levels of housing delivery overall may lead to lower delivery of affordable housing, as well as types of housing adapted to meet the changing needs of the population, including the elderly. This, in turn, may lead to some sectors of the community looking to meet their accommodation needs in other authority areas and may lead to adverse impacts on community cohesion. Higher house prices and lower levels of affordable housing may also lead to greater levels of commuting and greater social inequality as some types of employment needs are met outside the authority area and lower income job opportunities in the district are taken up by those living outside the area.
- B.1.2.4** Option 2 would support housing growth in settlement locations where there is greater potential to improve the sustainability of the settlement by delivering new local facilities and services to meet daily needs as part of the new development. This option would support the delivery of larger strategic sites in some locations as well as supporting some growth to meet local needs across the other categories of settlements. While this option may be more dependent on bringing forward larger strategic sites, there is a greater level of certainty in the availability of sites and the deliverability of this strategy in comparison to Option 1.
- B.1.3 SA Objective 2: Health and wellbeing**
- B.1.3.1** In relation to access to health services, existing GP surgeries are associated with the medium size and larger settlements across the district, with occasional practices within the High Weald AONB. Existing hospitals are located in Haywards Heath, which has an A&E department, and East Grinstead, which has a Minor Injuries Unit.
- B.1.3.2** As set out in the Scoping Report², 82.2% of existing households are within a 15 minute walk (approximately 1.2km) from a GP Surgery, Health Centre or Hospital. This figure reflects the proportion of households in proximity 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.

² Mid Sussex District Council (November 2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed: 11/01/22]

- B.1.3.3 The additional growth in housing proposed under both spatial options would be expected to facilitate an increase in the provision of GP healthcare facilities to meet the increase in local demand. MSDC will engage with the West Sussex Clinical Commissioning Group through the district Plan Review process to ensure that there is sufficient overall health capacity to support development proposals.
- B.1.3.4 In relation to the spatial location of development, increasing growth at the main settlements would be likely to locate residents in proximity to a range of existing healthcare services which would be expected to increase capacity to meet the increase in demand from new households. Spatial Option 2 seeks to identify growth areas in proximity to an existing settlement with healthcare, and other, facilities where possible. Larger scale new developments may support the delivery of new healthcare facilities, such as a new GP practice, although such new facilities are planned by the West Sussex Clinical Commissioning Group and there is some uncertainty about the future delivery of new healthcare practices.
- B.1.3.5 In both spatial options, delivering lower levels of development in smaller settlements may lead to some residents being located at less sustainable distances from healthcare facilities.
- B.1.3.6 Both spatial options are, therefore, likely to perform in a similar way in relation to access to GP services, with some uncertainty in the location of healthcare provision for a new growth area.
- B.1.3.7 It is recognised that, in rural areas, residents' access to healthcare can be improved through alternative provision, such as outreach clinics and remote access consultations. These types of services can be adapted and varied to meet local needs and are not included in this high level spatial assessment of access to health services.
- B.1.3.8 In this largely rural district, sustainable access to hospitals which have an A&E department is often limited for many residents. The main A&E department is located in Haywards Health. Option 1, which would support development in proximity to the three main settlements, including Haywards Heath and parts of Burgess Hill and East Grinstead would be likely to locate some residents in sustainable distances of hospital services. Growth located in medium and smaller settlements may locate new residents at greater distances from hospital services. The performance of Option 2 would be dependent on the location of the main areas of housing growth in relation to hospital services. As for Option 1, proportionate housing growth in smaller settlements may locate some residents at greater, less sustainable, distances from hospital services.
- B.1.3.9 Promoting health and wellbeing also seeks to encourage active healthy lifestyles and social interaction, including: active travel such as walking and cycling; ensuring access to high quality green infrastructure and opportunities for play, sport and recreation; avoiding potential pollution or other environmental hazards; and, creating spaces and places to meet.

- B.1.3.10** Supporting active travel, such as walking and cycling, to meet daily needs is likely to be easier to achieve where development is well-related to a range of existing or new services, facilities, employment opportunities and sustainable transport options. Such areas are typically in or near existing main settlements, such as Burgess Hill, Haywards Health, East Grinstead, Hassocks and Hurstpierpoint, as well as locations at the fringe of other main towns, such as Crawley. Encouraging social interaction would also be more likely to be achieved where there are existing community facilities and activities such as primary schools, community halls, libraries, public open spaces and parks and active community groups. Such facilities are typically located in existing towns or other built-up areas. However, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities alongside the opportunity to plan new routes for active/sustainable travel. Option 1 and Option 2 are likely to perform similarly in relation to this aspect of this SA Objective.
- B.1.3.11** As set out in the Scoping Report, Mid Sussex has a high level of club membership and sports participation and this need is likely to increase alongside future development. The availability of natural green space and other green infrastructure can also benefit resident's physical health and mental wellbeing. The availability of sports facilities, publicly accessible open spaces and other types of green infrastructure is likely to be more variable between different types of location. Spatial Option 1 would be likely to support development in proportion to the existing settlement hierarchy where there is likely to be greater access to public open space and sports facilities. In more rural locations there is likely to be greater access to the countryside by the rights of way network. A larger growth area, as supported in Spatial Option 2, is likely to incorporate public open space, play space and green infrastructure in accordance with emerging policy and, as such, are likely to provide some types of open space in proximity to new residents. Both options are likely to perform in a similar way against this aspect.
- B.1.3.12** Overall, both options perform similarly in relation to access to community facilities and public open space and green infrastructure, which may encourage active, healthy lifestyles. Options which locate a greater number of new residents in closer proximity to hospital services would perform better under this objective; this would be more likely under Option 1. Under Option 2, where there is uncertainty about the location of the growth area, the assessment of access to hospital services is therefore uncertain. There is also some uncertainty in relation to Spatial Option 2 in relation to the delivery of and access to GP practices.

B.1.4 SA Objective 3: Education

- B.1.4.1** As set out in the Scoping Report³, there are 42 primary schools and seven secondary schools serving the district. In terms of access to education, 89.8% of households within Mid Sussex are within a 15 minute walk (approximately 1.2km) from a primary school, and 64.9% of households are within 20 minute walk from a secondary school. This figure reflects 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. MSDC will engage with West Sussex County Council through the district Plan Review process to ensure that there is sufficient school capacity to support development proposals.
- B.1.4.2** In relation to the spatial location of growth, Option 1 would locate greater levels of housing growth proportionately across the existing settlements and would be more likely to locate new residents in sustainable distances to existing primary schools. Option 2 would be likely to lead to the delivery of a larger growth area of over 1,000 homes and is anticipated to be of sufficient scale to support an additional new primary school within the site, as well as plan sustainable access routes to this school for many new residents. Both options are likely to perform in a similar way in relation to sustainable access to primary schools.
- B.1.4.3** It is recognised that existing primary schools may be operating at, or close to, pupil capacity in some locations. It is assumed in this assessment that existing primary schools may be able to be extended or adapted to meet the predicted increase in school places as a consequence of the increase in housing growth. MSDC will engage with West Sussex District Council to plan for an increase in capacity to meet the predicted increase in school places required.
- B.1.4.4** Existing secondary schools are located in Burgess Hill (Oakmeads Community College and St Paul's Catholic College), East Grinstead (Sackville Community College and Imberhorne School), Haywards Heath (Oathall Community College), Hassocks (Downlands Community School) and Cuckfield (Warden Park School).
- B.1.4.5** Option 1 is likely to locate greater levels of new development in proximity to existing main settlements and is more likely to lead to new residents having sustainable access to secondary education. Option 2 would be unlikely to lead to levels of growth which would support the development of a new secondary and would instead rely on providing sustainable access to existing secondary schools. The options for the provision of sustainable access to secondary schools could include school bus services or the identification of cycling routes, depending on the location of the growth area in relation to existing secondary schools. There is a greater level of uncertainty in the provision of sustainable access to secondary schools in relation to Spatial Option 2.

³ Mid Sussex District Council (November 2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed 11/01/22]

B.1.5 SA Objective 4: Community and crime

B.1.5.1 Mid Sussex has low levels of crime with only 36.98 crimes per 1000 residents in 2012/13. Sussex Police support the recommendations set out in 'Secured by Design' which seeks to reduce opportunities for criminal activities through design measures to help create safe and sustainable communities. Such measures can be implemented through local plan policies.

B.1.5.2 The spatial location and design of new development can support opportunities for social interaction and community cohesion by providing spaces and places for communities to meet or locating new development in proximity to existing community facilities, such as primary schools, community halls, libraries, public open spaces, parks and active community groups. Such facilities are typically located in existing towns or other built-up areas. However, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities. Option 1 would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns and other settlements. Option 2 supports a greater level of growth in proximity to an existing settlement in order to support the delivery of new community facilities, which could include a new primary school, local shops to meet daily needs and new public open space. While Option 2 would be likely to deliver some new community facilities, the location of the growth area in relation to existing settlements is unknown at this stage and there is some uncertainty regarding new resident's access to a wider range of community facilities, such as libraries, community halls and community run groups.

B.1.5.3 Spatial Options which support the separate identities of communities and reduce the likelihood of settlement coalescence would help to support community cohesion. The assessment of this criteria is dependent on the location of new development in relation to existing settlements and the character of the landscape between settlements, which may influence the perception of separation between settlements. While many existing settlements across the district appear to be distinct and separate, there are some locations where there is greater potential for settlement coalescence, for example, between Hassocks, Hurst Wickham and Hurstpierpoint and between Albourne and Sayers Common. Option 1 would be likely to support to the separate identities of communities as the three main settlements are geographically distinct. Proportionate growth across the settlement hierarchy could also be distributed to maintain settlement separation. The growth location or urban extension proposed under Spatial Option 2 could be delivered to maintain settlement separation, although there is greater uncertainty in the assessment as the location is unknown at this stage.

B.1.6 SA Objective 5: Flooding and surface water

B.1.6.1 This SA Objective primarily considers the impact that each spatial option could have in relation to flood risk, as well as green infrastructure coverage across the Plan area. Soils and vegetation play key roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas.

- B.1.6.2** As set out in the Scoping Report, there are areas of high and medium flood risk associated with the district's rivers which comprise the River Ouse, River Adur and Herrings Stream. The River Ouse rises in the High Weald and flows, broadly, south east towards Haywards Heath. The River Adur lies to the east and north of Burgess Hill then flows westwards out of the district. Herrings Stream flows northwards between Hurstpierpoint and Sayers Common, before turning west and joining the River Adur.
- B.1.6.3** The Council's Strategic Flood Risk Assessment (SFRA) has identified that a relatively small area of the district (2.7% of the total land area) is at a high risk of flooding. Additionally, approximately 1.6km² of the district is affected by drainage problems, groundwater flooding and overland flows. Parts of Mid Sussex are also at a high risk of flooding from surface water. The SFRA (2015) shows that the areas at risk of flooding are likely to increase as a result of climate change.
- B.1.6.4** The management of fluvial and surface water flood risk is a key issue in the planning and design of new development. However, the SFRA shows that the areas of high and medium flood risk are distributed throughout the district and affect a relatively small proportion of the land area in comparison to other authority areas. The River Adur lies to the east and north of Burgess Hill and associated flood zones may present a constraint to development in some locations. There are also some zones of high and medium flood risk through Hassocks and to the north of Hurstpierpoint. However, other locations around these settlements are not shown to have a known flood risk. There are areas of high and medium risk of surface water flooding dispersed throughout most settlements within the district.
- B.1.6.5** Due to the dispersed nature of areas of high and medium flood risk and the relatively small proportion of land in the district constrained by flood risk both Spatial Options are likely to perform in a similar way in relation to this aspect of this SA Objective. The assessment and mitigation of potential flood risk associated with new development is set out in national planning policy and guidance and local plan policies. Future planning applications for development sites would need to provide site-based Flood Risk Assessments and mitigation proposals, where required, to ensure flood risk is managed in accordance with national and local requirements.
- B.1.6.6** Vegetation, soils and other green infrastructure play a key role in the management of surface water flooding, facilitating the infiltration and attenuation of surface water runoff. Both spatial options are likely to require the development of greenfield sites, as opposed to the reuse of previously developed land, and may result in some loss of associated vegetation and soils. Both Spatial Options are likely to perform in a similar way in relation to this aspect of this SA Objective. As described above, all future planning applications for development would be required to provide site-specific assessments of flood risk and the mitigation of flood risk in accordance with national planning policy and guidance as well as Local Plan policies in relation to flood risk and surface water management. Such requirements seek to mitigate end users' exposure to flood risk by designing the right land uses in the right places and maintain 'greenfield runoff rates' using Sustainable Urban Drainage methods, wherever possible. While the management of flood risk and surface water management are key planning issues and potential development constraints, both Spatial Options are likely to perform in a similar way against this SA Objective.

B.1.7 SA Objective 6: Natural resources

- B.1.7.1** The Agricultural Land Classification system grades land based on its suitability for and limitations to growing crops. Grade 1 is classed as the best quality and most versatile while Grade 5 is the poorest land in relation to agricultural uses. Grades 1, 2 and 3a comprise the Best and Most Versatile (BMV) Agricultural Land, however, the data available does not divide Grade 3 into categories 3a and 3b.
- B.1.7.2** There is no Grade 1 agricultural land within the district. 1.4% of the district is classified as Grade 2. Much of this Grade 2 land lies in the South Downs National Park (and therefore, not in the Plan area) with some areas lying to the south and west of Albourne. The majority of the district (63.7%) is classified as Grade 3. It is likely that some of this land would be classified as Grade 3a and therefore BMV land. Grade 3 land surrounds the majority of settlements, including main settlements as well as the lower order settlements. There are ribbons of Grade 4 land, not classed as BMV, across the district possibly associated with watercourses or steeply sloping topography. Due to the distribution of potential BMV land across the district, it is likely that the delivery of new development in proximity to any of the settlements would lead to the loss of BMV land. Spatial Options 1 and 2 would perform in a similar way in respect to this aspect of this SA Objective.
- B.1.7.3** Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSA).
- B.1.7.4** Where a proposal for non-minerals development coincides with an identified MSA, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals may be inaccessible for potential extraction in the future. This could therefore result in a potential adverse impact under the natural resources SA Objective.
- B.1.7.5** MSA apply to much of land within the district, particularly in those areas lying outside nationally designated landscapes. There are areas lying outside MSAs to the north of the district around Cophorne and Crawley Down, some areas surrounding Haywards Heath and small pockets near Bolney and Ansty. There are a number of smaller settlements lying within the High Weald AONB which lie outside the MSA, such as Handcross, Horsted Keynes, Slaugham and Staplefield.
- B.1.7.6** Spatial Option 1 supports growth at the three main settlements and with proportionate growth across the other lower order settlements, potentially including some growth to support local needs in settlements in the AONB. Spatial Option 2 supports the development of a growth point or an urban extension to support the sustainability of an existing lower order settlement. The majority of land in proximity to the three main settlements and many of the lower order settlements lie within identified MSAs. In relation to the potential effects of Spatial Option 1, there are some locations surrounding East Grinstead and Haywards Heath as well as some land surrounding lower order settlements which lie outside the MSAs. In relation to Spatial Option 2, there are some locations adjacent to lower order settlements which, if chosen as a growth point for other sustainability reasons, lie outside the MSA. However, it is likely that both Spatial Options would lead to the allocation of land within MSAs and potential minor negative impacts on this aspect of this SA Objective.

B.1.7.7 For development proposals within MSAs, consultation is required with West Sussex County Council (WSCC) and a Minerals Resource Assessment may be required. WSCC would need to be satisfied that either minerals sterilisation will not occur (because the mineral resources are not economically viable or that an appropriate level of prior extraction can take place) or that there is an overriding need for the development.

B.1.7.8 Both Spatial Options are likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously development land. The development of greenfield sites is likely to lead to the loss of soils, which is considered to be a finite natural resource. Both Spatial Options would be likely to lead to a minor negative impact on this aspect of this SA Objective.

B.1.8 SA Objective 7: Biodiversity and geodiversity

B.1.8.1 There are no Habitats sites within the district, however, the Ashdown Forest SPA/ SAC lies adjacent to the north-east boundary of Mid Sussex and within Wealden District. Potential adverse impacts on Habitats sites as a consequence of the proposals set out in the Local Plan will be considered in a Habitats Regulations Assessment (HRA).

B.1.8.2 Some development proposals could potentially increase threats and pressures which could result in detrimental impacts at these sites and their qualifying features. At this stage of Plan preparation, any proposal that would lead to a net increase in dwellings within a 7km Zone of Influence (ZoI) has the potential to have adverse recreational impacts on the Ashdown Forest SPA/SAC. Development proposed within this zone, for example near East Grinstead, Crawley Down or other lower order settlements, such as Ashurst Wood, Turners Hill, West Hoathly, Sharpthorne, Ardingly and Horsted Keynes, have the potential to have adverse impacts on this Habitats site, without mitigation. Adverse impacts on Habitats sites can occur as a result of other threats and pressures, such as changes to air quality, amongst others. The emerging HRA will identify the potential range of impacts on Habitats sites as a consequence of proposals in the DPR. At the time of writing, the conclusions of the HRA are not available, and as such there is uncertainty in relation to the assessment of the potential impacts of each Spatial Option on this aspect of the SA Objective. Therefore, this aspect has not be included in the overall assessment of this SA Objective at this stage.

B.1.8.3 There are numerous SSSIs within the district, predominately located within the High Weald AONB or in the South Downs National Park. Spatial Option 2, which seeks to limit growth in the settlements within the High Weald AONB would also be likely to have fewer adverse impacts on SSSIs within the AONB. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Spatial Option 1, which supports development at the three main towns, including Burgess Hill, has the potential to have greater adverse impacts on this SSSI. Spatial Option 2, therefore, has the potential to support growth in locations which may have fewer adverse impacts on SSSIs.

- B.1.8.4** There are approximately 1,443 areas of ancient woodland, covering 5,282ha, widely spread across the district. Many areas of ancient woodland are associated with the High Weald AONB. Outside the High Weald AONB, there are numerous areas of ancient woodland to the north of the district, in proximity to Crawley and Crawley Down and also between Burgess Hill and Haywards Heath. At this high level of assessment, Spatial Option 2, which seeks to limit growth in the High Weald AONB and supports a new growth point at a sustainable location, has the potential to have fewer adverse impacts on ancient woodland than Spatial Option 1, which supports growth at the three main towns and proportional growth across the settlement hierarchy to meet local needs. However, given the quality and dispersed nature of areas of ancient woodland across the district, there is the potential for both Spatial Options to lead to adverse impacts on ancient woodland.
- B.1.8.5** There are six Local Nature Reserves and 50 Local Wildlife Sites across the district. There are numerous LWS and LNRs located in proximity to Haywards Heath, with fewer to the north of the district and few sites located to central areas and west of the district. Spatial Option 1 would support development in proximity to the three main towns, including Haywards Heath which may lead to adverse impacts on these locally designated sites, however, there are fewer locally designated sites located in proximity to Burgess Hill and East Grinstead. Spatial Option 2 supports development in a sustainable location and has the potential to have fewer impacts on locally designated biodiversity sites, although the location of the growth point is unknown and the potential impacts on this aspect of the SA Objective are uncertain at this stage.
- B.1.8.6** Both Spatial Options are likely to require the development of greenfield sites (as opposed to the use of previously developed land) which may lead to the loss of, and adverse impacts on, priority habitats. At this high level of assessment, both Spatial Options are likely to perform in a similar way when assessed against this aspect of this SA Objective.
- B.1.9 SA Objective 8: Landscape**
- B.1.9.1** Approximately 60% of the district is protected by national landscape designations; approximately 50% lies within the High Weald AONB and over 10% is within the South Downs National Park (the latter lying outside the area the subject of this DPR). Land lying outside of these designated areas but assessed as contributing to its special qualities may be considered to form the ‘setting’ to the designated landscape, and development within such areas would be required to conserve and enhance the special qualities of the landscape.
- B.1.9.2** Spatial Option 1 supports development at the three main towns and proportional growth across the other settlements in the hierarchy. Spatial Option 2 supports new growth points at lower category settlements and seeks to limit growth in the settlements located in protected landscapes. Spatial Option 1 has the potential to lead to greater levels of development coming forward in protected landscapes and potentially adverse impacts on these nationally designated areas. Spatial Option 2 seeks to limit development at settlements in protected landscapes. It is recognised that residential development can be integrated into the landscape and designed to conserve and enhance landscape character and quality, however, at this high level of assessment it assumed that a lower quantum of development in these nationally designated landscapes would lead to lower levels of adverse impacts.

B.1.9.3 MDSC commissioned a Landscape Capacity Study⁴ which assessed the capacity of the landscape to accommodate development without an unacceptable impact on landscape character. In this study, some areas of land identified as having high, medium/high or medium capacity to accommodate development can be found surrounding all three main settlements and south of Crawley Down, as well as land in proximity to West Hoathly and Ardingly in the High Weald AONB. Much of the landscape surrounding many settlements is identified as having medium/low, low, low/negligible or negligible capacity to accommodate development, reflecting the qualities and strength of landscape character across the district.

B.1.9.4 Spatial Option 1 may lead to lower levels of adverse impacts on the character of the landscape, based on the findings of the Landscape Capacity Study, although the nature of the impacts would depend on the detailed location and design of development. Given the limited locations and extents of medium and higher capacity areas, Spatial Option 2 is more likely to lead to development in an area identified as having a lower capacity to accommodate change, although this may provide a stronger protection for the AONB. Both Spatial Options are likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.

B.1.10 SA Objective 9: Cultural heritage

B.1.10.1 The towns and villages of Mid Sussex are often attractive, and the historic environment is of a high quality and strong character.

B.1.10.2 There are 1,064 Listed Buildings within the district, often associated with historic settlements. However, there are numerous Listed Buildings widely dispersed across the district, such that both Spatial Options are likely to perform in a similar way in relation to potential impacts on Listed Buildings.

B.1.10.3 Conservation Areas are designated for their special architectural or historic interest and are associated with the historic cores of a number of settlements across the district, including the three main settlements as well as many of the Category 2 settlements, with the exception of Copthorne, Crawley Down and Hassocks. Many of the Category 3 and 4 settlements in the High Weald AONB have associated Conservation Areas, reflecting the historic character of the environment. Spatial Option 2 supports a new growth point at a sustainable location and seeks to limit growth in the settlements in the AONB. This option provides the opportunity to locate development in a location which reduces potential impacts on Conservation Areas and limits growth in the settlements in the AONB, which may also reduce the potential for impacts on associated Conservation Areas. Spatial Option 1, which supports growth at the three main settlements as well as proportionate growth across the other settlements in the hierarchy has the potential to locate development in proximity to associated Conservation Areas.

⁴ Hankinson Duckett Associates (2007) 'Mid Sussex Landscape Capacity Study' Available at https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Accessed on 07/01/22]

- B.1.10.4 There are ten Registered Parks and Gardens within the district, many of which are located within the High Weald AONB and most of which are not located in proximity to existing settlements. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.5 The Scheduled Monuments within the district are predominantly located within the High Weald AONB or the South Downs National Park. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.6 There are numerous Archaeological Notification Areas across the district, often located within the designated landscapes of the High Weald AONB and South Downs National Park and the areas to the north and south of these designations. There is also the potential for, as yet undiscovered, underground archaeology at any new development site. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.7 The impacts of development on cultural heritage assets can be positive or adverse and are highly dependent on the design and layout of development and, therefore, there is uncertainty in the assessment of these effects.
- B.1.10.8 Overall, both Spatial Options are likely to perform in a similar way in relation to potential impacts on heritage assets, although Spatial Option 2 is likely to have fewer adverse effects on Conservation Areas than Spatial Option 1.

B.1.11 SA Objective 10: Climate change and transport

- B.1.11.1 This SA Objective assesses the potential impacts of each Spatial Option in relation to reducing the need for residents to undertake journeys by private car, increasing the use of public transport, such as buses and trains, and increasing opportunities for the use of sustainable active transport, such as walking and cycling. These changes to travel modes and patterns have the potential to reduce GHG emissions and air pollution associated with transport. Energy efficiency and generation is considered under SA Objective 11.
- B.1.11.2 The Scoping Report states that air quality in Mid Sussex is generally 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. Development which locates new residents in proximity to the AQMA or leads to increases in concentrations of pollutants within the AQMA would be assessed as having adverse impacts on this objective. At this stage of the assessment, there is limited data available regarding changes to traffic flows as a consequence of development set out in the DPR. Both Spatial Options could lead to some new development locations in proximity to Hassocks and would perform in a similar way in relation to this aspect.

B.1.11.3 The majority of community, education and retail facilities are located in existing town centres. The three main towns and Hassocks are also serviced by existing train stations. Spatial Option 1, which supports growth in the main centres and proportionally across the other settlements in the hierarchy, may reduce the need to travel by private car and support opportunities for the use of public transport and active travel. Spatial Option 2 supports new growth points in proximity to existing lower category settlements. It is likely that these growth areas would support some mixed uses, retail, education and community facilities as part of the new development and would be likely to require a new public transport link. It is anticipated that private car usage overall, however, may be greater than for Spatial Option 1. The nature of the impact would depend on the location of the growth point in relation to existing public transport services and the types of facilities and services proposed as part of the development.

B.1.12 SA Objective 11: Energy and waste

B.1.12.1 The proposed development of at least an additional 8,169 dwellings not already planned for would be expected to lead to an increase in carbon emissions associated with the construction and occupation of development. The proposals would also be likely to result in the loss of greenfield land and vegetation cover, which have carbon storage capabilities.

B.1.12.2 The DPR seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal. These objectives would be achieved through the implementation of national and local planning policies for all development proposals.

B.1.12.3 Both Spatial Options are likely to perform in a similar way against this SA Objective.

B.1.13 SA Objective 12: Water resources

B.1.13.1 The District lies within the South East River Basin. The South East river basin district river basin management plan⁵ identifies the pressures faced by the water environment and actions required to address them. The main pressures are point source pollution from sewage treatment works, the physical modification of water bodies, diffuse pollutions from agricultural activities, diffuse pollution from urban sources and water abstraction. South East Water, Thames Water and Sutton and East Surrey Water are the water companies providing services for the Mid Sussex District.

B.1.13.2 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.

⁵ Environment Agency (2015) 'South East River District River Basin Management Plan' Available at <https://www.gov.uk/government/publications/south-east-river-basin-district-river-basin-management-plan> [Date accessed 10/01/22]

- B.1.13.3 Mid Sussex District is served by seven wastewater treatment works. Some of the existing sewerage infrastructure within the district is operating at or near capacity and unless significant investment is made, water quality within the watercourses in the district may be at risk. In particular, Goddards Green Wastewater Treatment Works (near Burgess Hill) has been identified as having constraints with regards to capacity and odour,
- B.1.13.4 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 year with low rainfall the demand for water will be more than the water available for use.
- B.1.13.5 This SA Objective seeks to maintain and improve the water quality of the district's watercourses and aquifers and support sustainable water resources management in relation to the development and change proposed in the DRP. These objectives seek to maintain water dependent habitats and associated water quality and promote water efficiency through the use of sustainable design and construction techniques.
- B.1.13.6 There are numerous watercourses dispersed across the district, including in proximity to the three main settlements and many of the Category 2 settlements. Both Spatial Options are likely to perform in a similar way in relation to potential impacts of diffuse urban pollution on the water quality of these watercourses.
- B.1.13.7 Extensive areas of Source Protection Zones are located within the South Downs National Park and a smaller zone in the High Weald AONB, near Horsted Keynes. Given the small area of land constrained by the SPZ within the High Weald, both Spatial Options are likely to have negligible impacts on this aspect of this SA Objective.
- B.1.13.8 Spatial Options which support larger growth areas have the potential to facilitate the delivery of development which incorporates greater water efficiency measures, such as grey water recycling. For smaller development sites such measures may not be deliverable due to the impact on the financial viability of the development scheme. Both Spatial Options could support the delivery of larger development sites and could perform in a similar way in relation to the delivery of this aspect of this SA Objective.

B.1.14 SA Objective 13: Economic regeneration

- B.1.14.1 This SA Objective seeks 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.1.14.2 In seeking to deliver development proportionally across the settlement hierarchy, Spatial Option 1 would be likely to support business in the three main towns and the village centres, as well as supporting any local retail needs in the lower category settlements. Spatial Option 2 seeks to deliver a new growth point, which is likely to lie in proximity to a lower order settlement, and limit development within the settlements located within the High Weald AONB. The level of growth proposed at the growth point seeks to be able to support new retail opportunities as part of the development and, in turn, support the vitality of the associated settlement. By limiting growth in the lower category settlements within the High Weald AONB, Spatial Option 2 may limit the viability of delivering new business opportunities associated with these settlements and have a negligible impact on village centre regeneration.

B.1.15 SA Objective 14: Economic growth

B.1.15.1 The Scoping Report sets out the key sustainability issues in relation to economic growth and employment. Just over half of the Mid Sussex workforce live and work in the district, with 45.6% being employed outside of the district. The relatively high level of out-commuting can lead to congestion on the road network and overcrowded trains. The most common places for residents to work, outside the district, are Crawley, Brighton and Hove, Westminster and the City of London and Tandridge. The Scoping Report describes existing residents as being employed across a variety of sectors, challenging the delivery of meeting employment needs locally.

B.1.15.2 As described in the Mid Sussex District Plan 2021–2039 Consultation Draft, the Economic Growth Assessment Update (December 2021) identifies employment need over the plan period based. This study identifies no outstanding residual employment need, as there is sufficient committed supply.

B.1.15.3 The Consultation Draft Plan goes on to state:
“The strategy for achieving sustainable economic prosperity and resilience...will focus on; supporting successful delivery of committed development, helping to secure timely delivery of key supporting infrastructure, encouraging inward investment and providing support for existing businesses”.

B.1.15.4 This SA Objective seeks to promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

B.1.15.5 Spatial Option 1 would be likely to support business in the three main town centres and the village centres, as well as supporting any local retail needs in the lower category settlements. This option may also serve to support the allocations for employment uses at Burgess Hill as well as allocations for employment at Handcross and Pease Pottage.

- B.1.15.6 Spatial Option 2 seeks to deliver new growth points, which are likely to lie in proximity to lower order settlements, and limit development within the settlements located within the High Weald AONB. The level of development proposed at the growth points seeks to be able to support mixed use development and new local retail opportunities as part of the development and, in turn, support the vitality of the associated settlement. ‘Significant sites’ may also provide some element of local employment space. The location of the growth point is unknown and, therefore, it is uncertain if this option would serve to support existing employment areas and local businesses. By delivering a greater level of growth as part of a growth point there is likely to be lower levels of development in some of the main settlements. Spatial Option 2 may limit the viability of delivering new business opportunities associated with these settlements.

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Appendix C: Pre-Mitigation Site Assessments

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C.1 Overview

C.1.1.1 This report comprises **Appendix C** of the Regulation 18 SA Environmental Report (ER) and should be read alongside this report.

C.1.1.2 The following sections of this appendix provide an appraisal of each of the 42 reasonable alternative sites (**Figures 1.1** and **1.2**) identified by Mid Sussex District Council, in accordance with the SA methodology set out in **Chapter 2** of the main SA report.

C.1.1.3 Each appraisal includes an SA scoring matrix that provides an indication of the nature and magnitude of effects, at the pre-mitigation stage (see **Tables C.2.1 – C.15.1**). Assessment narratives are presented alongside the scoring matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.

C.1.1.4 Each site is assessed against the SA Framework (**Appendix A**), which is comprised of the following objectives:

- **SA Objective 1** - To ensure that everyone has the opportunity to live in a home for their need and which they can afford (housing)
- **SA Objective 2** - To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health (health and wellbeing)
- **SA Objective 3** - To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities (education)
- **SA Objective 4** - To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities (community and crime)
- **SA Objective 5** - To reduce the risk to people, properties, the economy and the environment of flooding from all sources (flooding and surface water)
- **SA Objective 6** - To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re- use of materials from buildings, and encourage urban renaissance (natural resources)
- **SA Objective 7** - To conserve and enhance the district's biodiversity and geodiversity (biodiversity and geodiversity)
- **SA Objective 8** - To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place (landscape)
- **SA Objective 9** - To protect, enhance and make accessible for enjoyment, the district's historic environment (cultural heritage)
- **SA Objective 10** - To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change (climate change and transport)

- **SA Objective 11** - To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal (energy and waste)
- **SA Objective 12** - To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management (water resources)
- **SA Objective 13** - To encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres (economic regeneration)
- **SA Objective 14** - To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities (economic growth)

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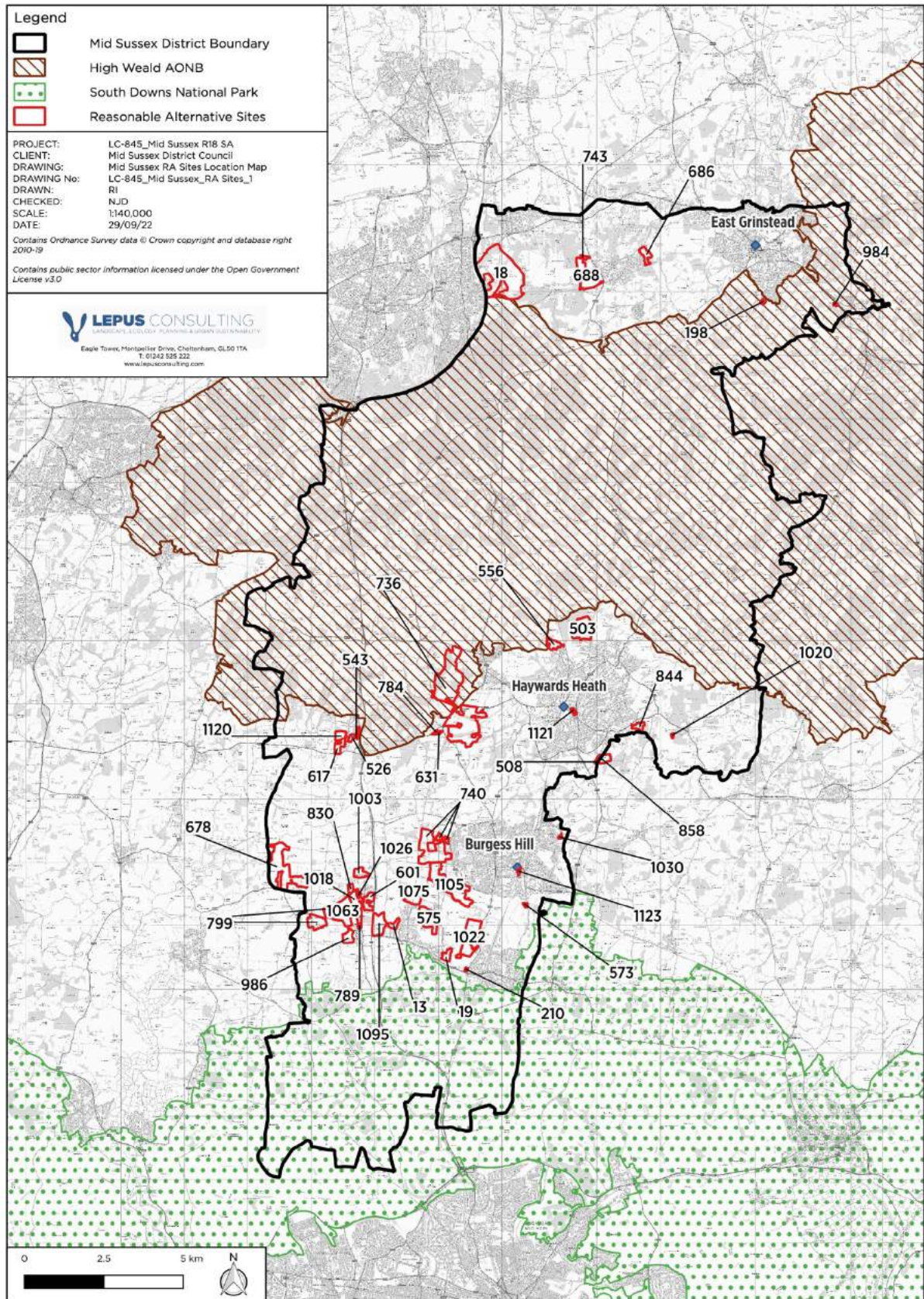


Figure C.1.1: Location map of the reasonable alternative sites within Mid Sussex

C.2 SA Objective 1 - Housing

C.2.1 Net Gain in Housing

- C.2.1.1 Residential-led development would be expected to result in an overall net gain in housing. Since the reasonable alternative sites in Mid Sussex are proposed for residential and/or mixed use development, it would be expected that all sites would have a positive impact on housing provision within the Plan area. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs upon development and are therefore considered to have major positive impacts on housing provision. Sites which have been identified as having capacity of 99 dwellings or less are expected to have a minor positive impact on housing provision.
- C.2.1.2 The site assessments concluded that 23 sites have been identified as having capacity for 100 dwellings or more and have therefore been categorised as having the potential to have a major positive impact on housing provision. Some sites within this category were identified as having capacity for a significantly higher number of residential dwellings such as Site 503 (700 dwellings) and Site 678 (900 dwellings).
- C.2.1.3 On the other hand, some sites were identified as having capacity for significantly less dwellings such as Site 984 (8 dwellings) and Site 1030 (25 dwellings). Development of these sites could have a minor positive impact on housing provision within the Plan area.
- C.2.1.4 Sites 18, 736, 740, 799 and 1105 are proposed for residential or mixed-use developments and were identified as having capacity for 1,000 dwellings or more.

Table C.2.1: Sites impact matrix for SA Objective 1 - Housing

Site Ref	Net Gain in Housing
13	+
18	++
19	+
198	+
503	++
508	+
210	+
526	+
543	+
556	+
573	+
575	++
601	++
617	++
631	+
678	++
686	++
688	++
736	++
740	++
743	+
784	+
789	+
799	++
830	++
844	++
858	+
984	+
986	++
1003	++
1018	++
1020	+
1022	++
1026	+
1030	+
1063	+
1075	++
1095	++
1105	++
1120	++
1121	++
1123	++

C.3 SA Objective 2 – Health and Wellbeing

C.3.1 NHS hospital with A&E Department

C.3.1.1 The target distance for sustainable access to an NHS hospital with A&E department is 5km. 29 sites are located outside of this target distance, and therefore proposed developments at these sites are expected to have a minor negative impact on access to essential healthcare.

C.3.1.2 Sites 198, 503, 508, 556, 686, 736, 844, 858, 984, 1020, 1030, 1121 and 1123 are within 5km of either Queen Victoria Hospital in East Grinstead or Princess Royal Hospital in Haywards Heath; therefore, the proposed development at these 13 sites is considered to have the potential for a minor positive impact on access to essential healthcare.

C.3.2 Pedestrian Access to GP Surgery

C.3.2.1 The target distance for a proposed development is to be within approximately 1.2km or a 15-minute walk from a GP surgery or a health centre.

C.3.2.2 Sites 1121 and 1123 are located within a 10-minute walk from healthcare facilities and proposed development at these sites would therefore be expected to have a major positive impact on sustainable access to healthcare.

C.3.2.3 Sites 13, 210, 556 and 743 are located within a 15-minute walking distance and therefore proposed development at these sites would be expected to have a minor positive impact on access to healthcare.

C.3.2.4 All other sites are located further than the sustainable 15-minute walk threshold from healthcare facilities. However, Sites 198, 573, 575, 686, 688, 740, 844, 1075 and 1095 are located within a 20-minute walk from healthcare facilities, and the potential impact on access to healthcare of a proposed development at these nine sites is expected to be negligible.

C.3.2.5 The remaining 27 sites are located over the sustainable target distance of a 20-minute walk from these facilities. It would be expected that the proposed development at these remaining sites would have a minor negative impact on access to healthcare.

C.3.3 Leisure Centres

C.3.3.1 All proposed development located within the sustainable target distance of 1.5km to a leisure centre is expected to have positive impacts on access to these facilities.

C.3.3.2 Site 740 is located within 1.5km from The Triangle Leisure Centre in Burgess Hill, and Sites 556 and 1121 are located within 1.5km from The Dolphin Leisure Centre in Haywards Heath. It is therefore expected that the proposed development at these three sites would have a minor

positive impact on access to leisure facilities and the resulting health and wellbeing of residents.

- C.3.3.3 The remaining 39 reasonable alternative sites are further than the target distance from the nearest leisure centre and would therefore be expected to have a minor negative impact on access to these facilities.

C.3.4 AQMA

- C.3.4.1 All reasonable alternative sites, with the exception of Site 210, are located at least 200m from an Air Quality Management Area (AQMA) and therefore a minor positive impact on human health would be expected for site end users at these 41 sites.

- C.3.4.2 Site 210 is located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.

C.3.5 Main Road

- C.3.5.1 Sites located within 200m from a main road would be expected to have a minor negative impact on the health and wellbeing of site-end users. The proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution.

- C.3.5.2 Sites 18, 210, 526, 543, 601, 617, 631, 736, 740, 784, 844, 984, 1022, 1095, 1105 and 1120 are located less than 200m from one or more main road including the A22, A23 and A272. The proposed development at these 16 sites is therefore considered to have a minor negative impact on site end users.

- C.3.5.3 The remaining 26 sites are located over 200m from a main road and are therefore expected to have a minor positive impact on site end user health and wellbeing through being less likely to expose site end users to potentially poor air quality and noise pollution associated with traffic using main roads.

C.3.6 Access to Greenspace

- C.3.6.1 Access to outdoor space and a diverse range of natural habitats is known to have mental and physical health benefits. A minor positive impact on residents' health and wellbeing can therefore be expected if a site is within the target distance of 300m from an OS Green space¹, a leisure facility or an open space facility.

¹ Ordnance Survey (2022) OS Greenspace – A More Active, Greener, Healthier Nation. Available at: <https://getoutside.ordnancesurvey.co.uk/greenspaces/> [Accessed 27/09/2022]

C.3.6.2 Sites 198, 508, 526, 543, 573, 631, 784, 789, 830, 858, 984, 986, 1003, 1020, 1026, 1030, 1075, 1105, 1121 and 1123 are within the target distance of these facilities and are therefore expected to potentially have a minor positive impact on the health and wellbeing of site end users at these locations.

C.3.6.3 The remaining 22 sites are located outside of the target distance of 300m from greenspaces which could potentially lead to a minor negative impact on access to these facilities and subsequently the health and wellbeing of site end users at these locations.

C.3.7 Net Loss of Greenspace

C.3.7.1 Site 1105 coincides with two areas of publicly accessible greenspace identified on the Council's dataset, including a large proportion of 'Maltings Farm', and a small proportion of 'Hammond Ridge Meadows'. The proposed development at this site could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

C.3.8 PRow/Cycle Paths

C.3.8.1 Proposed development sites that provide good accessibility to the PRow and/or cycle path network would likely encourage residents' engagement in physical activity and active travel which could have a resulting minor positive impact on the health and wellbeing of site end users.

C.3.8.2 All reasonable alternative sites are expected to provide access to Mid Sussex's PRow and/or cycle path network and therefore are likely to have a minor positive impact on access to these facilities with subsequent health benefits.

Table C.3.1: Sites impact matrix for SA Objective 2 - Health and Wellbeing

Site Reference	NHS hospital with A&E Department	Pedestrian Access to GP Surgery	Leisure Centres	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/Cycle Paths
13	-	+	-	+	+	-	0	+
18	-	-	-	+	-	-	0	+
19	-	-	-	+	+	-	0	+
198	+	0	-	+	+	+	0	+
210	-	+	-	-	-	-	0	+
503	+	-	-	+	+	-	0	+
508	+	-	-	+	+	+	0	+
526	-	-	-	+	-	+	0	+
543	-	-	-	+	-	+	0	+
556	+	+	+	+	+	-	0	+
573	-	0	-	+	+	+	0	+
575	-	0	-	+	+	-	0	+
601	-	-	-	+	-	-	0	+
617	-	-	-	+	-	-	0	+
631	-	-	-	+	-	+	0	+
678	-	-	-	+	+	-	0	+
686	+	0	-	+	+	-	0	+
688	-	0	-	+	+	-	0	+
736	+	-	-	+	-	-	0	+
740	-	0	+	+	-	-	0	+
743	-	+	-	+	+	-	0	+
784	-	-	-	+	-	+	0	+
789	-	-	-	+	+	+	0	+
799	-	-	-	+	+	-	0	+
830	-	-	-	+	+	+	0	+
844	+	0	-	+	-	-	0	+
858	+	-	-	+	+	+	0	+
984	+	-	-	+	-	+	0	+
986	-	-	-	+	+	+	0	+
1003	-	-	-	+	+	+	0	+
1018	-	-	-	+	+	-	0	+
1020	+	-	-	+	+	+	0	+
1022	-	-	-	+	-	-	0	+
1026	-	-	-	+	+	+	0	+
1030	+	-	-	+	+	+	0	+
1063	-	-	-	+	+	-	0	+
1075	-	0	-	+	+	+	0	+
1095	-	0	-	+	-	-	0	+
1105	-	-	-	+	-	+	-	+
1120	-	-	-	+	-	-	0	+
1121	+	++	+	+	+	+	0	+
1123	+	++	-	+	+	+	0	+

C.4 SA Objective 3 – Education

C.4.1 Pedestrian Access to Primary Schools

- C.4.1.1 The sustainable target distance for a residential site to be located to a primary school is within a 15-minute walk (approximately 1.2km) or less to the school which would provide site end users with good access to primary education. Sites 13, 198, 526, 617, 789, 986, 1020, 1063, 1120 and 1121 are located within a 10-minute walk from a primary school which is expected to have a major positive impact on the access to primary schools for site end users.
- C.4.1.2 Sites 210, 543, 556, 573, 743, 799, 984 and 1123 are located within 15 minutes' walk from a primary school which is expected to have a minor positive impact on access to primary education.
- C.4.1.3 Sites 686, 688, 740, 844, 1018, 1026, 1030, 1075 and 1095 are located within a 20-minute walk from a primary school. It is expected that the proposed development at these nine sites would have a negligible impact on access to primary education facilities.
- C.4.1.4 The remaining sites are located over a 20-minute walk from primary schools and therefore the proposed development at these 15 sites would be likely to have a minor negative impact on access to primary education for site end users.

C.4.2 Pedestrian Access to Secondary Schools

- C.4.2.1 To have sustainable access to secondary education, a proposed residential site should be located within 1.5km of these facilities. The following sites are located within this target distance to a secondary school: 210 (Downlands Community School); 1123 and 573 (Oakmeeds Community College); 740 (St Paul's Catholic College); and 1121 (Oathill Community College). These five sites are therefore likely to have a minor positive impact on access to secondary education for site end users.
- C.4.2.2 The remaining 37 sites are located outside of the target distance from the nearest secondary school, and it is therefore expected that the proposed development at these sites will likely have a minor negative impact on access to secondary education for site end users.
- C.4.2.3 Sites which have been assessed as being within target distance for both primary and secondary schools would likely have an overall major positive impact on access to education (Sites 210, 573, 1121 and 1123) (see **Table 4.2** within the main SA Report).

C.4.3 Further Education

- C.4.3.1 Sites which are located within 3km from a further education facility are likely to have good access to these facilities and therefore a minor positive impact on access to education for site end users could be expected. Eight reasonable alternative sites meet this criteria; Sites

503, 556, 736 and 1121 are located within the target distance to Central Sussex College, and Sites 736, 740, 1075, 1105 and 1123 are located within the target distance to St Paul’s Catholic College.

Table C.4.1: Sites impact matrix for SA Objective 3 - Education

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
13	++	-	0
18	-	-	0
19	-	-	0
198	++	-	0
210	+	+	0
503	-	-	+
508	-	-	0
526	++	-	0
543	+	-	0
556	+	-	+
573	+	+	0
575	-	-	0
601	-	-	0
617	++	-	0
631	-	-	0
678	-	-	0
686	0	-	0
688	0	-	0
736	-	-	+
740	0	+	+
743	+	-	0
784	-	-	0
789	++	-	0
799	+	-	0
830	-	-	0
844	0	-	0
858	-	-	0
984	+	-	0
986	++	-	0
1003	-	-	0
1018	0	-	0
1020	++	-	0
1022	-	-	0
1026	0	-	0
1030	0	-	0
1063	++	-	0
1075	0	-	+
1095	0	-	0
1105	-	+	+
1120	++	-	0
1121	++	+	+
1123	+	-	+

C.5 SA Objective 4 – Community and Crime

C.5.1 IMD

C.5.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England². Deprivation levels within Mid Sussex varies from area to area, however, the district on a whole is relatively affluent, and none of the RA sites fall within of the 10% most deprived areas within England as identified by the study.

C.5.2 Pedestrian Access to Community Facilities

C.5.2.1 The target distance a proposed site should be within to have sustainable access to community facilities such as shops, community halls, places of worship and libraries is within a 15-minute walk.

C.5.2.2 Sites 1121 and 1123 are located within a 10-minute walk from community facilities and therefore the proposed development at these two sites would be expected to have a major positive impact on access to community facilities.

C.5.2.3 Sites 13 and 210 are located within a 15-minute walk from community facilities and therefore proposed development at these two sites would be expected to have a minor positive impact for site end users.

C.5.2.4 Sites 198, 573 and 1095 are located within a 20-minute walk from community facilities. The proposed development at these three sites would be likely to have a negligible impact on access to community facilities.

C.5.2.5 The remaining sites are located over a 20-minute walk from community facilities and therefore the proposed development on these 35 sites would be likely to have a minor negative impact on access to community facilities for site end users.

C.5.3 Public Transport Access to Community Facilities

C.5.3.1 Sites that are located within a 30-minute journey or less using public transport to access community facilities such as a shop, a community hall, a place of worship or a library would be expected to have minor positive impacts for site end users relating to the accessibility to these facilities.

² Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 26/01/22]

C.5.3.2 Sites 13, 210, 1075, 1121 and 1123 are located within less than 10-minutes via public transport from community facilities and are therefore expected to have a major positive impact on accessibility to community facilities.

C.5.3.3 Sites 556, 508, 858, 984 and 1030 are located within a 30-minute public transport journey from community services and it is therefore expected that the proposed development at these sites would result in a minor positive impact on accessibility to these facilities.

C.5.3.4 The remaining 32 sites are further than a 30-minute public transport journey away from community facilities and it is therefore expected that the proposed development at those sites would have a minor negative impact for the accessibility to those facilities.

C.5.4 Loss of Community Facilities

C.5.4.1 Site 1121 coincides with The Orchards Shopping Centre in Haywards Heath, which includes a range of local shops and services including Tesco Express and Marks and Spencer Food. The proposed residential development at this site could potentially result in the loss of these shops, and subsequently reduce the range of community facilities available in Haywards Heath. A minor negative impact on the provision of community facilities could occur.

C.5.5 Built Up Area Boundary

C.5.5.1 Proposed residential sites which are located outside of 150m from a built-up area boundary, attributed to 22 of the 42 reasonable alternative sites, are identified as having the potential to have a minor negative impact on cohesion and integration with existing local communities due to being physically separated from these communities.

Table C.5.1: Sites impact matrix for SA Objective 4 - Equality and Crime

Site Ref	IMD	Pedestrian Access to Community Facilities	Public Transport Access to Community Facilities	Loss of Community Facilities	Built Up Area Boundary
13	0	+	++	0	0
18	0	-	-	0	-
19	0	-	-	0	0
198	0	0	-	0	0
210	0	+	++	0	0
503	0	-	-	0	-
508	0	-	+	0	0
526	0	-	-	0	0
543	0	-	-	0	0
556	0	-	+	0	0
573	0	0	-	0	0
575	0	-	-	0	-
601	0	-	-	0	-
617	0	-	-	0	-
631	0	-	-	0	0
678	0	-	-	0	-
686	0	-	-	0	0
688	0	-	-	0	-
736	0	-	-	0	-
740	0	-	-	0	-
743	0	-	-	0	-
784	0	-	-	0	0
789	0	-	-	0	-
799	0	-	-	0	-
830	0	-	-	0	-
844	0	-	-	0	0
858	0	-	+	0	-
984	0	-	+	0	0
986	0	-	-	0	-
1003	0	-	-	0	-
1018	0	-	-	0	-
1020	0	-	-	0	0
1022	0	-	-	0	-
1026	0	-	-	0	0
1030	0	-	+	0	0
1063	0	-	-	0	-
1075	0	-	++	0	0
1095	0	0	-	0	-
1105	0	-	-	0	-
1120	0	-	-	0	-
1121	0	++	++	-	0
1123	0	++	++	0	0

C.6 SA Objective 5 – Flooding

C.6.1 Fluvial Flood Risk

- C.6.1.1 Sites 556, 678, 740 and 1105 are partially located within Flood Zone 3, associated with watercourses such as the River Adur and minor watercourse ‘Pooke Bourne’, meaning that there is a flood risk of 1% or more annually in the affected areas. The proposed development at these four sites could locate site-end users in areas of high flood risk and therefore a major negative impact on flooding at these sites could be expected.
- C.6.1.2 Sites 18 and 736 are located within Flood Zone 2, meaning that there is a flood risk of between 0.1% and <1% annually within the affected area. The proposed development at these two sites is therefore likely to have a minor negative impact on flooding.
- C.6.1.3 The remaining 36 reasonable alternative sites are located within Flood Zone 1 where there is less than 0.1% chance of flooding in any year. The proposed development at these sites is likely to locate site-end users in areas at low risk of flooding and therefore a minor positive impact could be expected.

C.6.2 Surface Water Flood Risk

- C.6.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) risk relating to the probability of surface water flooding occurring in a given area.
- C.6.2.2 The proposed development at 21 of the 42 reasonable alternative sites (Sites 18, 19, 556, 575, 601, 678, 686, 688, 736, 740, 743, 799, 830, 986, 1003, 1018, 1022, 1026, 1075, 1095 and 1105) coincide with areas of high SWFR and therefore development of these sites could locate site end users within areas at high risk of surface flooding, potentially leading to major negative impacts.
- C.6.2.3 The proposed development at Sites 13, 503, 508, 617, 844, 1020, 1120, 1121 and 1123 coincide with areas of low and medium SWFR and could therefore have a minor negative impact on flooding by potentially locating site end users within these affected areas.
- C.6.2.4 The remaining 12 reasonable alternative sites do not coincide with areas of SWFR and therefore the proposed development would be expected to have a minor positive impact on flooding by locating site end users in areas not prone to surface water flooding.

Table C.6.1: Sites impact matrix for SA Objective 5 – Flooding

Site Ref	Fluvial Flood Risk	Surface Water Flood Risk
13	+	-
18	-	--
19	+	--
198	+	+
210	+	+
503	+	-
508	+	-
526	+	+
543	+	+
556	--	--
573	+	+
575	+	--
601	+	--
617	+	-
631	+	+
678	--	--
686	+	--
688	+	--
736	-	--
740	--	--
743	+	--
784	+	+
789	+	+
799	+	--
830	+	--
844	+	-
858	+	+
984	+	+
986	+	--
1003	+	--
1018	+	--
1020	+	-
1022	+	--
1026	+	--
1030	+	+
1063	+	+
1075	+	--
1095	+	--
1105	--	--
1120	+	-
1121	+	-
1123	+	-

C.7 SA Objective 6 – Natural Resources

C.7.1 Previously Developed Land

C.7.1.1 40 of the 42 proposed development sites wholly or partially compromise undeveloped land which could lead to minor negative impacts on natural resources associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

C.7.1.2 Sites 1121 and 1123 largely comprises previously developed land which would likely have minor positive impacts on natural resources through the potential for efficient use of land.

C.7.2 Agricultural Land Classification

C.7.2.1 Sites 18, 503, 575, 678, 736, 740, 799, 1022, 1095 and 1105 are classified as ALC Grade 1, 2 or 3 and are over 20ha in area. Therefore, due to the large nature of these sites and the potential for irreversible loss of these valuable soil resources, it is expected that the proposed development at these 10 sites would have major negative impacts on natural resources.

C.7.2.2 Sites 13, 19, 210, 508, 526, 543, 556, 573, 601, 617, 631, 686, 688, 784, 789, 830, 844, 858, 984, 986, 1003, 1018, 1020, 1026, 1030, 1063, 1075 and 1120 are less than 20ha in area and are located upon land classified as ALC Grade 1, 2 or 3. The proposed development at these 28 sites would be likely to have a minor negative impact on agricultural land through the potential irreversible loss of BMV soil resources.

C.7.2.3 Sites 198 and 743 are located upon land which is classified as ALC Grades 4 and 5 and therefore the proposed development at these sites is likely to result in negligible impacts on natural resources.

C.7.3 Mineral Safeguarding Area

C.7.3.1 Nationally and locally important mineral resources which should be protected from unnecessary sterilisation are identified within Mineral Safeguarding Areas (MSAs).

C.7.3.2 33 of the 42 proposed development sites coincide with MSAs that contain brick clay, consolidated bedrock or unconsolidated sand. The development of these sites could potentially lead to sterilisation of these mineral resources where the minerals would be inaccessible for potential extraction in the future. Therefore, the proposed development at these sites would be likely to have a minor negative impact on natural resources.

C.7.3.3 Sites 18, 508, 631, 688, 743, 784, 858, 984 and 1121 do not coincide with MSAs and therefore proposed development at these sites is therefore expected to have a negligible impact on mineral resources.

Table C.7.1: Sites impact matrix for SA Objective 6 - Natural Resources

Site Ref	Previously Developed Land	Agricultural Land Classification	Mineral Safeguarding Area
13	-	-	-
18	-	--	0
19	-	-	-
198	-	0	-
210	-	-	-
503	-	--	-
508	-	-	0
526	-	-	-
543	-	-	-
556	-	-	-
573	-	-	-
575	-	--	-
601	-	-	-
617	-	-	-
631	-	-	0
678	-	--	-
686	-	-	-
688	-	-	0
736	-	--	-
740	-	-	-
743	-	0	0
784	-	-	0
789	-	-	-
799	-	--	-
830	-	-	-
844	-	-	-
858	-	-	0
984	-	-	0
986	-	-	-
1003	-	-	-
1018	-	-	-
1020	-	-	-
1022	-	--	-
1026	-	-	-
1030	-	-	-
1063	-	-	-
1075	-	-	-
1095	-	--	-
1105	-	--	-
1120	-	-	-
1121	+	0	0
1123	+	0	-

C.8 SA Objective 7 – Biodiversity

C.8.1 Habitats Sites

C.8.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Sites 198, 556, 686, 688, 984, 1030, 1121 and 1123 are located within the established 7km Zone of Influence³ for Ashdown Forest SPA and SAC which is located to the north east of the district boundary. The proposed development could increase recreational pressure on this Habitats site and therefore potentially have minor negative impacts on biodiversity upon development of these sites.

C.8.1.2 34 of the 42 reasonable alternative sites are not located within 7km of Ashdown Forest SPA and SAC and are therefore expected to have negligible impacts on biodiversity associated with this Habitats site. Potential effects of development on other Habitats sites will be explored fully in the Habitats Regulations Assessment.

C.8.2 Sites of Special Scientific Interest

C.8.2.1 Site 686 is located within an SSSI IRZ which states that “*Any residential development of 100 or more houses outside existing settlements/urban areas*” should consult Natural England. The proposed development of 125 dwellings at this site could therefore have potentially minor negative impact on SSSIs related to this IRZ (including ‘Hedgecourt’ SSSI and ‘Weir Wood Reservoir’ SSSI).

C.8.3 Ancient Woodlands

C.8.3.1 Mid Sussex District contains large areas of ancient woodland, especially concentrated within the northern area of the district including ‘Worth Forest’ and ‘Wakehurst Park’. Sites 18, 575, 601, 678, 688, 736, 740 and 1022 coincide with areas of ancient woodland and development at these locations could result in a direct loss of these important biodiversity assets.

C.8.3.2 Sites 198, 503, 686, 743, 844, 858 and 1020 are located adjacent to or within 15m of ancient woodlands. The proposed development at these seven sites would therefore be likely to have a minor negative impact on ancient woodland by increasing development related pressures or threats.

C.8.4 Veteran Trees

C.8.4.1 Being a heavily wooded district, Mid Sussex has large quantities of veteran trees scattered throughout the area. Sites 18, 503, 688 and 740 have been identified as coinciding with one

³ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Accessed on 27/09/22]

or more veteran trees. The proposed development at these sites could potentially lead to major negative impacts including the damage or loss of these important biodiversity assets.

C.8.5 Local Nature Reserves

C.8.5.1 There are eight Local Nature Reserves (LNRs) within Mid Sussex including ‘Eastern Road Nature Reserve’, ‘Blunts and Paiges Wood’ and ‘Ardingly Reservoir’. None of the reasonable alternative sites are located in close proximity to these LNRs such that adverse impacts would be likely to occur as a result of the development. A negligible impact has been identified for all sites.

C.8.6 Local Wildlife Sites

C.8.6.1 There are various Local Wildlife Sites (LWSs) located throughout Mid Sussex including ‘Oaken Wood, Stony Plays and High Lines’ LWS, ‘Wickham Woods’ LWS and ‘Great Wood and Copyhold Hanger’. Sites 18, 503, 556, 686, 736 and 1033 are located adjacent to or within close proximity to a LWS. The proposed development at these sites may result in minor negative impacts on these LWSs due to increased development related threats and pressures.

C.8.7 Priority Habitats

C.8.7.1 Priority habitats can be found throughout Mid Sussex and include deciduous woodland, grass moorland and traditional orchard. Sites 18, 198, 503, 556, 575, 601, 678, 688, 736, 740, 858, 984, 986, 1022, 1075, 1095 and 1105 coincide with areas of priority habitat. The proposed development at these sites could potentially result in the loss or degradation of these habitats and result in a minor negative impact on the overall presence of priority habitats across the Plan area.

Table C.8.1: Sites impact matrix for SA Objective 7 - Biodiversity

Site Ref	Habitats Sites	SSSI	National Nature Reserves	Ancient Woodland	Veteran Trees	Local Nature Reserves	Local Wildlife Sites	Priority Habitat	Open Mosaic Habitat
13	0	0	0	0	0	0	0	0	0
18	0	0	0	--	--	0	-	-	0
19	0	0	0	0	0	0	0	0	0
198	-	0	0	-	0	0	0	-	0
210	0	0	0	0	0	0	0	0	0
503	0	0	0	-	--	0	-	-	0
508	0	0	0	0	0	0	0	0	0
526	0	0	0	0	0	0	0	0	0
543	0	0	0	0	0	0	0	0	0
556	-	0	0	0	0	0	-	-	0
573	0	0	0	0	0	0	0	0	0
575	0	0	0	--	0	0	0	-	0
601	0	0	0	--	0	0	0	-	0
617	0	0	0	0	0	0	0	0	0
631	0	0	0	0	0	0	0	0	0
678	0	0	0	--	0	0	0	-	0
686	-	-	0	-	0	0	-	0	0
688	-	0	0	--	--	0	0	-	0
736	0	0	0	--	0	0	-	-	0
740	0	0	0	--	--	0	0	-	0
743	0	0	0	-	0	0	0	0	0
784	0	0	0	0	0	0	0	0	0
789	0	0	0	0	0	0	0	0	0
799	0	0	0	0	0	0	0	0	0
830	0	0	0	0	0	0	0	0	0
844	0	0	0	-	0	0	0	0	0
858	0	0	0	-	0	0	0	-	0
984	-	0	0	0	0	0	0	-	0
986	0	0	0	0	0	0	0	-	0
1003	0	0	0	0	0	0	0	0	0
1018	0	0	0	0	0	0	0	0	0
1020	0	0	0	-	0	0	0	0	0
1022	0	0	0	--	0	0	0	-	0
1026	0	0	0	0	0	0	0	0	0
1030	-	0	0	0	0	0	0	0	0
1063	0	0	0	0	0	0	0	0	0
1075	0	0	0	0	0	0	0	-	0
1095	0	0	0	0	0	0	0	-	0
1105	0	0	0	0	0	0	0	-	0
1120	0	0	0	0	0	0	0	0	0
1121	-	0	0	0	0	0	0	0	0
1123	-	0	0	0	0	0	0	0	0

C.9 SA Objective 8 - Landscape

C.9.1 High Weald AONB

C.9.1.1 High Weald AONB comprises a large proportion of the northern area of Mid Sussex District. Sites 198 and 984 are located within the High Weald AONB and have been identified as having the potential to have a ‘moderate impact’ on the AONB upon development. A major negative impact on this designated landscape could therefore be expected for these sites.

C.9.2 South Downs National Park

C.9.2.1 South Downs National Park comprises a large proportion of the southern area of Mid Sussex. Sites 13, 19, 575, 799, 986, 1022, 1095 and 1105 are located in close proximity to the National Park and are identified to be within areas where there is potential for new development to alter the setting of the landscape. A minor negative impact on the setting of this landscape could therefore be expected at these sites.

C.9.3 Landscape Capacity

C.9.3.1 Landscape capacity is defined as *“the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type”*⁴.

C.9.3.2 Site 503 is located in an area identified as having ‘medium/high’ landscape capacity, and therefore a minor positive impact on the local landscape could occur, owing to the land parcel being able to accommodate change without significant impacts on the landscape quality and characteristics.

C.9.3.3 Site 574 is located within an area identified as having ‘medium’ landscape capacity, which is deemed to likely have a negligible impact on the landscape setting upon development.

C.9.3.4 34 of the 42 reasonable alternative sites are located in areas of ‘negligible-low’, ‘low’ or ‘low/medium’ landscape capacity where development within these areas could have the potential to significantly impact landscape character and setting. The proposed development at these sites could therefore be expected to have a minor negative impact on the landscape.

C.9.3.5 Sites 210, 631, 678, 784, 1121 and 1123 are located outside of the landscape capacity study area and therefore, the landscape capacity is unknown at these sites.

⁴ Natural England (2013) The Countryside Agency Topic Paper 6: Techniques and Criteria for judging capacity and sensitivity. Available at: <http://publications.naturalengland.org.uk/publication/5146500464115712> [Date Accessed: 27/01/22]

C.9.4 Country Park

C.9.4.1 There are various Country Parks within Mid Sussex including ‘Worth Way’, ‘Forest Way’ and a small proportion of Country Parks ‘Tilgate Park’ and ‘Ditchling Common’. Sites 18, 686 and 688 are located adjacent to or in close proximity to ‘Worth Way’ Country Park, where there is potential for the proposed development to have a minor negative impact on the setting of the country park.

C.9.5 Alter Views for PRow Network Users

C.9.5.1 The development proposed at 33 of the 42 reasonable alternative sites are located in the vicinity of Mid Sussex’s PRow network, and the development of such sites could potentially alter the views of countryside or open space currently experienced by the users of these footpaths. Therefore, a minor negative impact on the local landscape could be expected at these 33 sites.

C.9.5.2 Sites 210, 508, 556, 573, 617, 686, 984, 1121 and 1123 are separated from PRow by existing built form, and their development would therefore be unlikely to significantly alter views experienced by PRow users.

C.9.6 Increased Risk of Coalescence

C.9.6.1 Sites 18, 575, 736, 799, 1018, 1022, 1063, 1095 and 1105 are situated between the existing communities of Mid Sussex such as Sayers Common and Albourne. Development of these sites could potentially lead to a loss of separation between settlements, and therefore potentially have minor negative impacts in relation to coalescence.

C.9.7 Urban Sprawl

C.9.7.1 32 of the 42 reasonable alternative sites lie outside of existing settlements within Mid Sussex. Development of these sites could increase the risk of urban sprawl and therefore a minor negative impact on landscape could be expected.

C.9.8 Multi-functional Greenspace

C.9.8.1 19 of the 42 reasonable alternative sites are located within 300m of multi-functional greenspace which would improve accessibility to the countryside and open spaces for site end users. Therefore, a minor positive impact on landscape could be expected at these sites.

C.9.9 Tree Preservation Order

C.9.9.1 A Tree Preservation Order (TPO) is an order made by local authorities in England to protect certain trees, groups of trees or areas of woodland. Sites 18, 210, 740 and 1121 coincide with areas of TPOs and/or individual trees designated as TPO protected. Therefore, these sites

could potentially directly harm these protected trees through development related threats and pressures and result in a minor negative impact on landscape setting.

Table C.9.1: Sites impact matrix for SA Objective 8 - Landscape

Site Ref	High Weald AONB	South Downs National Park	Landscape Capacity	Country Park	Alter Views for PRoW Network Users	Increased Risk of Coalescence/ Encroachment	Multi-functional Greenspace	Tree Preservation Order
13	0	-	-	0	-	-	0	0
18	0	0	-	-	-	-	0	-
19	0	-	-	0	-	-	0	0
198	--	0	0	0	-	-	+	0
210	0	0	+/-	0	0	0	0	-
503	0	0	+	0	-	-	0	0
508	0	0	-	0	0	0	+	0
526	0	0	-	0	-	0	+	0
543	0	0	-	0	-	0	+	0
556	0	0	-	0	0	-	0	0
573	0	0	0	0	0	-	+	0
575	0	-	-	0	-	-	0	0
601	0	0	-	0	-	-	0	0
617	0	0	-	0	0	-	0	0
631	0	0	+/-	0	-	-	+	0
678	0	0	+/-	0	-	-	0	0
686	0	0	-	-	0	-	0	0
688	0	0	-	-	-	-	0	0
736	0	0	-	0	-	-	0	0
740	0	0	-	0	-	-	0	-
743	0	0	-	0	-	0	0	0
784	0	0	+/-	0	-	-	+	0
789	0	0	-	0	-	-	+	0
799	0	-	-	0	-	-	0	0
830	0	0	-	0	-	-	+	0
844	0	0	-	0	-	-	0	0
858	0	0	-	0	-	-	+	0
984	--	0	0	0	0	0	+	0
986	0	-	-	0	-	-	+	0
1003	0	0	-	0	-	-	+	0
1018	0	0	-	0	-	-	0	0
1020	0	0	-	0	-	0	+	0
1022	0	-	-	0	-	-	0	0
1026	0	0	-	0	-	0	+	0
1030	0	0	-	0	-	-	0	0
1063	0	0	-	0	-	-	0	0
1075	0	0	-	0	-	-	+	0
1095	0	-	-	0	-	-	0	0
1105	0	-	-	0	-	-	+	0
1120	0	0	-	0	-	-	0	0
1121	0	0	+/-	0	0	0	+	-
1123	0	0	+/-	0	0	0	+	0

C.10 SA Objective 9 – Cultural Heritage

C.10.1 Listed Buildings (Grades I, II* and II)

C.10.1.1 There are many Listed Buildings scattered throughout Mid Sussex. The proposed development at Sites 13, 18, 19, 526, 575, 601, 678, 789, 736, 799, 844, 1063 and 1120 are located within close proximity to a Listed Building (Grades I, II* and II) and have been identified to have the potential to cause ‘medium’ or ‘high’ impact on these heritage assets including ‘Langton Grange’, ‘Wickham Farmhouse’ and ‘Hurstpierpoint College’.

C.10.1.2 The remaining 29 sites are identified as being unlikely to have significant impacts on the setting of any Listed Building.

C.10.2 Conservation Area

C.10.2.1 Mid Sussex contains 36 Conservation Areas (CAs). Sites 13, 19, 526, 575, 844, 986, 1095 and 1120 are located in close proximity to these CAs and have been identified to have the potential to cause ‘high’ impact on their settings. Therefore, minor negative impacts on CAs could be expected upon development of these sites.

C.10.2.2 The remaining 34 sites are identified as being unlikely to have significant impacts on any CA.

C.10.3 Scheduled Monument

C.10.3.1 The 44 reasonable alternative sites are not located in close proximity to any Scheduled Monument (SM). The proposed development at all of the reasonable alternative sites are likely to have negligible impacts on SMs.

C.10.4 Registered Park and Gardens

C.10.4.1 There are nine Registered Parks and Gardens (RPGs) within the Mid Sussex district, including ‘The High Beeches’, ‘Stonehurst’ and ‘Heaselands’ RPGs. Site 736 is located approximately 500m from ‘Heaselands’ RPG and, being a significantly large site, the proposed development at this site could potentially have a minor negative impact on the setting of this RPG. Site 556 is located approximately 15m (across the road) from ‘Borde Hill’ RPG. The proposed development at this site could potentially have a minor negative impact on the setting of this RPG.

C.10.4.2 The remaining reasonable alternative sites are deemed unlikely to have a significant impact on the setting of any RPG.

C.10.5 Archaeology

C.10.5.1 Sites 19, 503, 556, 617, 686, 688, 736, 1022, 1075, 1105 and 1120 have been identified as having the potential to have moderate impacts on archaeological assets, and therefore, for the purposes of this assessment a minor negative impact is recorded.

C.10.5.2 The remaining 31 sites are deemed unlikely to have a significant impact on archaeological sites and have therefore been assessed as negligible. However, archaeological impact assessments and other desk studies would provide further information regarding potential archaeological assets on a site-by-site basis.

Table C.10.1: Sites impact matrix for SA Objective 9 - Cultural Heritage

Site Ref	Listed Buildings (Grades I, II* and II)	Conservation Area	Scheduled Monument	Registered Park and Gardens	Archaeology
13	-	-	0	0	0
18	-	0	0	0	0
19	-	-	0	0	-
198	0	0	0	0	0
210	0	0	0	0	0
503	0	0	0	0	-
508	0	0	0	0	0
526	-	-	0	0	0
543	0	0	0	0	0
556	0	0	0	-	-
573	0	0	0	0	0
575	-	-	0	0	0
601	-	0	0	0	0
617	0	0	0	0	-
631	0	0	0	0	0
678	-	0	0	0	0
686	0	0	0	0	-
688	0	0	0	0	-
736	-	0	0	-	-
740	0	0	0	0	0
743	0	0	0	0	0
784	0	0	0	0	0
789	-	0	0	0	0
799	-	0	0	0	0
830	0	0	0	0	0
844	-	-	0	0	0
858	0	0	0	0	0
984	0	0	0	0	0
986	0	-	0	0	0
1003	0	0	0	0	0
1018	0	0	0	0	0
1020	0	0	0	0	0
1022	0	0	0	0	-
1026	0	0	0	0	0
1030	0	0	0	0	0
1063	-	0	0	0	0
1075	0	0	0	0	-
1095	0	-	0	0	0

Site Ref	Listed Buildings (Grades I, II* and II)	Conservation Area	Scheduled Monument	Registered Park and Gardens	Archaeology
1105	0	0	0	0	-
1120	-	-	0	0	-
1121	0	0	0	0	0
1123	0	0	0	0	0

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C.11 SA Objective 10 – Climate Change and Transport

C.11.1 AQMA

C.11.1.1 There is only one AQMA located within the Plan area, 'Mid Sussex AQMA No. 1'. All reasonable alternative sites, with the exception of Site 210, are located over 200m from any AQMA and therefore are located away from major sources of traffic related air pollution. Minor positive impacts on climate change and transport could be expected as these 41 sites are not expected to contribute further to areas generally associated with traffic congestion.

C.11.1.2 Site 210 is located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at this site would be likely to locate site end users in areas of existing poor air quality and may exacerbate existing air quality issues within the AQMA. A minor negative impact on local air quality would be expected.

C.11.2 Main Road

C.11.2.1 Various main roads pass through the Mid Sussex District, including the A272, A23 and A264. Sites 18, 210, 526, 543, 601, 617, 631, 740, 784, 736, 844, 984, 1022, 1095, 1105 and 1120 are located within 200m of a main road. The proposed development at these sites could potentially have a minor negative impact on transport related emissions, through potentially increasing traffic congestion in the local areas surrounding the sites.

C.11.2.2 The remaining reasonable alternative sites are located over 200m from a main road and therefore, the proposed development at these sites would be expected to have a minor positive impact on traffic and subsequent emissions.

C.11.3 Bus Services

C.11.3.1 Mid Sussex is a largely rural district where settlements experience varying levels of public transport provision. Sites 789, 1003, 1020, 1030, 1105, 1120, 1121 and 1123 have been identified as having the potential for 'excellent' bus transport access, and it is therefore expected that the proposed development at these sites will have a major positive impact on access to sustainable transport via bus services.

C.11.3.2 Sites 210, 573, 601, 631, 686, 688, 743, 784, 830, 984, 986, 1018, 1022, 1026, 1063, 1075 and 1095 are identified as having the potential for 'good' bus transport access. The proposed development at these sites is therefore expected to have a minor positive impact on a on access to sustainable transport via bus services.

C.11.3.3 Sites 13, 18, 19, 198, 503, 508, 526, 543, 556, 575, 617, 740, 799, 844 and 858 are identified as having the potential to have 'fair' bus transport access. The proposed development is

therefore expected to have a negligible impact on access to sustainable transport via bus services.

- C.11.3.4 Sites 678 and 736 are deemed have the potential for ‘poor’ bus transport access. The proposed development at these two sites could therefore expected to have a minor negative impact on access to sustainable transport via bus services.

C.11.4 Railway Station

- C.11.4.1 There are two railway lines running through Mid Sussex from north to south, with various train stations along them including Haywards Heath and Burgess Hill with links to major cities such as London and Brighton, as well as smaller towns. 36 of the 42 reasonable alternative sites are located outside of the sustainable target distance of a 15-minute walk or cycle (1.2km) from a railway station, and therefore the proposed development at these sites will potentially have a minor negative impact on the site end users’ access to rail services.

- C.11.4.2 Sites 210, 573, 1022, 1030, 1121 and 1123 are located within this target distance and are therefore expected to have a major positive impact on sustainable access to rail services.

C.11.5 Public Transport Access to Local Services

- C.11.5.1 Local services include superstores, services and facilities provided by town centres and high street shopping centres. Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.

- C.11.5.2 The remaining sites are not located within this target distance to local services and are therefore expected to have minor negative impacts on transport and accessibility.

C.11.6 Pedestrian Access to Local Services

- C.11.6.1 Sites 13, 210, 1121 and 1123 are located within the sustainable target distance of a 15-minute walk/cycle from local services. The proposed development at these sites would therefore be expected to have a major positive impact on accessibility to these services.

- C.11.6.2 The remaining 38 reasonable alternative sites are not located within this target distance to local services and therefore the proposed development at these sites are expected to potentially have a major negative impact on accessibility to these vital services.

C.11.7 Pedestrian Access to Convenience Store

C.11.7.1 Sites 13, 198, 210, 526, 617, 631, 784, 736, 984, 1020, 1030, 1095, 1105, 1120, 1121 and 1123 are within the sustainable target distance of a 15-minute walk from a convenience store and therefore the proposed development at these sites are expected to have a major positive impact on accessibility to these facilities.

C.11.7.2 The remaining 26 reasonable alternative sites are located outside of this target distance to a convenience store and therefore the proposed development at these sites would be expected to have a minor negative impact on future residents' accessibility to these facilities.

Table C.11.1: Sites impact matrix for SA Objective 10 - Climate Change and Transport

Site Ref	AQMA	Main Road	Public Transport Access via bus services	Railway Station	Public Transport Access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
13	+	+	0	-	+	++	++
18	+	-	0	-	-	-	-
19	+	+	0	-	-	-	-
198	+	+	0	-	-	-	++
210	-	-	+	++	+	++	++
503	+	+	0	-	-	-	-
508	+	+	0	-	+	-	-
526	+	-	0	-	-	-	++
543	+	-	0	-	-	-	-
556	+	+	0	-	+	-	-
573	+	+	+	++	-	-	-
575	+	+	0	-	-	-	-
601	+	-	+	-	-	-	-
617	+	-	0	-	-	-	++
631	+	-	+	-	-	-	++
678	+	+	-	-	-	-	-
686	+	+	+	-	-	-	-
688	+	+	+	-	-	-	-
736	+	-	-	-	-	-	++
740	+	-	0	-	-	-	-
743	+	+	+	-	-	-	-
784	+	-	+	-	-	-	++
789	+	+	++	-	-	-	-
799	+	+	0	-	-	-	-
830	+	+	+	-	-	-	-
844	+	-	0	-	-	-	-
858	+	+	0	-	+	-	-
984	+	-	+	-	+	-	++
986	+	+	+	-	-	-	-
1003	+	+	++	-	-	-	-
1018	+	+	+	-	-	-	-
1020	+	+	++	-	-	-	++
1022	+	-	+	++	-	-	-
1026	+	+	+	-	-	-	-
1030	+	+	++	++	+	-	++
1063	+	+	+	-	-	-	-

Site Ref	AQMA	Main Road	Public Transport Access via bus services	Railway Station	Public Transport Access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
1075	+	+	+	-	+	-	-
1095	+	-	+	-	-	-	++
1105	+	-	++	-	-	-	++
1120	+	-	0	-	-	-	++
1121	+	+	++	++	+	++	++
1123	+	+	++	++	+	++	++

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C.12 SA Objective 11 – Energy and Waste

C.12.1 Increase in Household Waste Generation

- C.12.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent.
- C.12.1.2 Sites 736, 740, 799 and 1105 are proposed for the development of more than 1,307 dwellings. The proposed development at these four sites could potentially result in a significant increase household waste generation, by more than 1% in comparison to current levels, which could lead to major negative impacts on waste generation within the Plan area.
- C.12.1.3 Sites 19, 503, 575, 601, 678, 686, 688, 986, 1018, 1022, 1075, 1095, 1120 and 1123 are proposed for the development of between 131 and 1,307 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.12.1.4 24 of the reasonable alternative sites are proposed for the development of 131 dwellings or less. The proposed development at these sites would be expected to have negligible impacts on household waste generation in comparison to current levels.

C.12.2 Increase in Energy Consumption Related GHG Emissions

- C.12.2.1 Residential-led development is likely to result in an increase in energy related GHG emissions through use of fossil fuel produced electricity, to some extent.
- C.12.2.2 Sites 18, 503, 575, 601, 617, 678, 686, 688, 736, 740, 799, 830, 844, 986, 1003, 1018, 1022, 1075, 1095, 1105, 1120, 1121 and 1123 are proposed for the development of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.
- C.12.2.3 The remaining 19 reasonable alternative sites are proposed for the development of 10 dwellings or more. It is therefore expected that the proposed development at these sites would likely have a minor negative impact on GHG emissions relating to energy consumption.

Table C.12.1: Sites impact matrix for SA Objective 11 - Energy and Waste

Site Ref	Increase in Household Waste	Increase in Energy Consumption
13	0	-
18	-	--
19	0	-
198	0	-
210	0	-
503	-	--
508	0	-
526	0	-
543	0	-
556	0	-
573	0	-
575	-	--
601	-	--
617	0	--
631	0	-
678	-	--
686	-	--
688	-	--
736	--	--
740	--	--
743	0	-
784	0	-
789	0	-
799	--	--
830	0	--
844	0	--
858	0	-
984	0	-
986	-	--
1003	0	--
1018	-	--
1020	0	-
1022	-	--
1026	0	-
1030	0	-
1063	0	-
1075	-	--
1095	-	--
1105	--	--
1120	-	--
1121	0	--
1123	-	--

C.13 SA Objective 12 – Water Resources

C.13.1 Watercourse

C.13.1.1 There are various major and minor watercourses within the Plan area, including the River Ouse and River Medway and related tributaries. Sites 18, 198, 556, 575, 678, 688, 736, 740, 830, 1003, 1022, 1030, 1075, 1095 and 1105 are located within 200m of a watercourse and therefore the proposed development at these sites could potentially increase the risk of contamination of these watercourses during construction and occupation. A minor negative impact on watercourse quality could therefore be expected at these sites upon development.

C.13.2 Groundwater SPZ

C.13.2.1 Within Mid Sussex, SPZs are located to the south and the north east of the district. The 42 reasonable alternative sites do not coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. The proposed development these sites could therefore be expected to have a negligible impact on protected groundwater resources.

Table C.13.1: Sites impact matrix for SA Objective 12 - Water Resources

Site Ref	Watercourse	SPZ
13	0	0
18	-	0
19	0	0
198	-	0
210	0	0
503	0	0
508	0	0
526	0	0
543	0	0
556	-	0
573	0	0
575	-	0
601	0	0
617	0	0
631	0	0
678	-	0
686	0	0
688	-	0
736	-	0
740	-	0
743	0	0
784	0	0
789	0	0
799	0	0
830	-	0
844	0	0
858	0	0
984	0	0
986	0	0
1003	-	0
1018	0	0
1020	0	0
1022	-	0
1026	0	0
1030	-	0
1063	0	0
1075	-	0
1095	-	0
1105	-	0
1120	0	0
1121	0	0
1123	0	0

C.14 SA Objective 13 – Economic Regeneration

C.14.1 Pedestrian Access to Local Services

- C.14.1.1 Good and sustainable access to local services such as a superstore, a town centre or a high street shopping centre, will likely lead to economic stimulation and regeneration where an increase in footfall could positively impact the local economy and provide new job opportunities for local residents. Sites 13, 210, 1121 and 1123 are located within the target distance of a 15-minute walk/cycle from local services and therefore the proposed development at this site is expected to have a major positive impact on accessibility.
- C.14.1.2 The remaining 38 reasonable alternative sites are not located within this sustainable target distance to local services, and therefore the proposed development at these sites would be expected to have a minor negative impact on accessibility.

C.14.2 Public Transport Access to Local Services

- C.14.2.1 Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport and therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.
- C.14.2.2 The remaining 32 sites are not located within this sustainable target distance from local services and are therefore expected to potentially have a minor negative impact on transport and accessibility.

Table C.14.1: Sites impact matrix for SA Objective 13 - Economic Regeneration

Site Ref	Pedestrian access to local services	Public transport access to local services
13	++	+
18	-	-
19	-	-
198	-	-
210	++	+
503	-	-
508	-	+
526	-	-
543	-	-
556	-	+
573	-	-
575	-	-
601	-	-
617	-	-
631	-	-
678	-	-
686	-	-
688	-	-
736	-	-
740	-	-
743	-	-
784	-	-
789	-	-
799	-	-
830	-	-
844	-	-
858	-	+
984	-	+
986	-	-
1003	-	-
1018	-	-
1020	-	-
1022	-	-
1026	-	-
1030	-	+
1063	-	-
1075	-	+
1095	-	-
1105	-	-
1120	-	-
1121	++	+
1123	++	+

C.15 SA Objective 14 – Economic Growth

C.15.1 Employment Floorspace

C.15.1.1 The provision of employment floorspace within Mid Sussex would provide various benefits to the local economy. Sites 18, 736, 740 and 799 are proposed for mixed-use developments where some land would be safeguarded for provision of employment floorspace which could help to provide site end users with local business and employment opportunities. Therefore, a major positive impact on the local economy would be expected as a result of the proposed development at these four sites.

C.15.1.2 Sites 503, 743, 1022, 1121 and 1123 coincide with areas of current employment floorspace, such as agricultural businesses or golf courses. The proposed development at these sites could potentially result in the loss of these businesses, and consequently the employment opportunities they provide. Therefore, a minor negative impact could be expected following the proposed development at these sites.

C.15.1.3 The remaining reasonable alternative sites are proposed for residential use only and therefore are likely to have a negligible impact on economic growth through employment floorspace provision.

C.15.2 Access to Primary Employment Locations

C.15.2.1 There are a range of employment locations within the Plan area within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. The 42 reasonable alternative locations are located within the sustainable target distance of 5km to key employment areas which would provide site end users with sustainable access to a range of employment opportunities capable of meeting their needs. Therefore, a minor positive impact on the local economy could be expected following the development of these sites.

Table C.15.1: Sites impact matrix for SA Objective 14 - Economic Growth

Site Ref	Employment Floorspace Provision	Access to Primary Employment Location
13	0	+
18	++	+
19	0	+
198	0	+
210	0	+
503	-	+
508	0	+
526	0	+
543	0	+
556	0	+
573	0	+
575	0	+
601	0	+
617	0	+
631	0	+
678	0	+
686	0	+
688	0	+
736	++	+
740	++	+
743	-	+
784	0	+
789	0	+
799	++	+
830	0	+
844	0	+
858	0	+
984	0	+
986	0	+
1003	0	+
1018	0	+
1020	0	+
1022	-	+
1026	0	+
1030	0	+
1063	0	+
1075	0	+
1095	0	+
1105	0	+
1120	0	+
1121	-	+
1123	-	+

Appendix D: Draft Policy Assessments

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D.1 Sustainability

D.1.1 Policy DPS1: Climate Change

DPS1: Climate Change

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

Reducing carbon emissions

- a) Development will be expected to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings. This includes new buildings and refurbishments and conversions of existing buildings. Detailed requirements are set out in Policies DPS2: Sustainable Design and Construction, DPS3: Renewable and Low Carbon Energy Schemes, and the Design Guide SPD.
- b) The Council will support renewable and low carbon energy schemes in line with the requirements set out in Policy DPS3: Renewable and Low Carbon Energy Schemes.
- c) Development should prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles. Detailed requirements are set out in Policies DPT3: Placemaking and Connectivity; DPT4: Cycling; and DPB1: Character and Design.
- d) Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be expected to take opportunities to reduce these emissions. This includes proposals that may use these other greenhouse gases in their design and operation, for example, refrigerants and air conditioning systems.

Maximising carbon sequestration

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

Climate change adaptation and mitigation

- h) Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply. Detailed policy requirements

DPS1: Climate Change

are set out in Policies DPS2: Sustainable Design and Construction; DPS4: Flood Risk and Drainage; and DPS5: Water Infrastructure and the Water Environment.

- i) Development will be expected to incorporate green infrastructure and nature-based solutions to moderate surface and air temperatures, increase biodiversity and as part of sustainable drainage systems. Detailed requirements are set out in Policies DPB1: Character and Design; DPS4: Flood Risk and Drainage; and DPN3: Green Infrastructure.
- j) Development will be expected to achieve a net gain in biodiversity and contribute to ecological networks. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.
- k) The Council will seek adaptation and mitigation measures that improve resilience to climate change and allow communities, businesses, buildings, infrastructure and ecology to adapt to the impacts of climate change.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS1	0	+	0	0	+	+	+	0	0	++	+	+	0	0

D.1.1.1 Policy DPS1 seeks to ensure that future development in the Plan area contributes to the mitigation of, and adaption to, climate change. The policy refers to other policies within the MSDPR which relate to achieving the Council’s climate change goals. The policy sets out the Council’s approach to climate change, covering topics such as reducing carbon emissions and maximising carbon sequestration within the Plan area.

D.1.1.2 The policy covers a wide range of themes to provide support and guidance for development proposals. This includes stating that new developments “*will be expected to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings*” whilst supporting renewable and low carbon schemes. Additionally, active travel is supported within the policy whereby new developments “*should prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles*”. This could help to encourage physical exercise and reduce emission of harmful air pollutants. Major positive impacts on climate change and transport within the Plan area would be expected through the criteria outlined within this policy (SA Objective 10), as well as minor positive impacts on energy and waste and human health (SA Objectives 2 and 11).

- D.1.1.3 Policy DPS1 requires all development to be designed to “*minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply*”. Additionally, the incorporation of requirements for biodiversity net gain, nature-based solutions to flood risk, tree protection, and the protection and provision of green infrastructure (GI) throughout the Plan area as a result of this policy, and other related policies within the MSDPR, would be likely to have positive impacts on flood management and habitat creation and protection. Therefore, a minor positive impact on flooding and biodiversity could be expected (SA Objectives 5 and 7). By aiming to protect water supplies within the Plan area from the effects of climate change, which could include prolonged periods of drought or water scarcity, a minor positive impact on water resources could result (SA Objective 12) by improving infrastructure preparedness to these events.
- D.1.1.4 The policy outlines that “*development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage*”, which could help to promote efficient use of land and the conservation of finite soil resources and ecosystem services they provide. The policy could therefore lead to a minor positive impact on natural resources through protection of ecologically and agriculturally important soils, potentially including BMV land, within the Plan area (SA Objective 6).

D.1.2 Policy DPS2: Sustainable Design and Construction

DPS2: Sustainable Design and Construction

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

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

Assessment frameworks

Planning applications should be accompanied by a pre-assessment, demonstrating how the BREEAM Technical Standards, or any future replacement standards, will be met.

Towards zero carbon development

All new build residential and non-residential development must meet at least ‘Excellent’ in BREEAM New Construction Technical Standards and must make reasonable endeavours to achieve an ‘Outstanding’ rating.

Specific BREEAM Technical Standards requirements will be required for significant sites and are detailed in those policies.

DPS2: Sustainable Design and Construction

Proposals for major residential development involving the refurbishment of existing buildings and conversions must meet at least 'Excellent' in BREEAM Refurbishment and Fit-Out Technical Standards and must make reasonable endeavours to achieve an 'Outstanding' rating.

All non-residential development for refurbishment of existing buildings and conversions over 500m² must meet at least 'Excellent' in BREEAM Refurbishment and Fit-Out Technical Standards and must make reasonable endeavours to achieve an 'Outstanding' rating.

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

Energy use

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

Opportunities for incorporating decentralised, renewable and low carbon energy schemes into all new development should be considered in line with Policy DPS3: Renewable and Low Energy Carbon Schemes.

Prevent overheating

All new development should incorporate design measures to minimise potential overheating such as through the layout, orientation and design of buildings. Opportunities should be maximised for passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided. Green and blue infrastructure should be incorporated in line with Policy DPN3: Green Infrastructure to provide natural cooling and shading.

Water resources and water efficiency

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

Development must meet the following water consumption standards:

- Residential units should meet a water consumption standard of 100 litres per person per day (including external water use);
- Non-residential buildings should meet the equivalent of an 'Excellent' standard as a minimum and make reasonable endeavours to achieve an 'Outstanding' rating, with regard to the BREEAM Technical Standards water consumption targets for the development type.

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

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

DPS2: Sustainable Design and Construction

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

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

Soil

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

Minimise waste

All development will be required to follow the waste hierarchy to minimise the amount of waste disposed to landfill and incorporate facilities that enable and encourage high rates of recycling and re-use of waste and materials.

The Council will seek to secure recycling facilities for new developments via planning conditions and/or planning obligations in line with Policy DPI2: Planning Obligations.

New development should minimise construction waste and maximise the recycling and re-use of demolition materials.

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0

D.1.2.1 Climate change is both an international and national concern and has many social and environmental implications. Policy DPS2 seeks to ensure that all development proposals will be expected to “contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability” within every phase of a project. Additionally, the policy sets out various BREEAM standards targets for future development proposals to achieve, amongst relevant national standards and other MSDPR policies, in order to combat climate change and its potential impacts.

D.1.2.2 This policy includes criteria for development proposals to meet which would help ensure that they are contributing to the mitigation of climate change. All developments are expected to

be energy efficient and follow the energy hierarchy through this policy to help reduce carbon emissions, as well as supporting opportunities “for incorporating decentralised, renewable and low carbon energy schemes into all new development” (in line with Policy DPS3). Additionally, through this policy all development should follow the waste hierarchy to minimise the amount of waste produced, as well as providing facilities which would encourage residents to recycle and re-use materials. Through this policy, recycling facilities for new developments will be sought in line with Policy DPI2. Overall, a major positive impact on energy and waste within the Plan area would be expected (SA Objective 11).

- D.1.2.3 Policy DPS2 also regards water resource management within the Plan area and sets out various criteria for proposals to meet in order to be supported by the Council, including ensuring that development proposals are in accordance with the findings of the Gatwick Sub Region Water Cycle Study. Further criteria include water consumption and efficiency standards to ensure a low impact on water resources, which may help to provide resilience against the impacts of climate change and improve water security. Additionally, this policy states that new developments are to incorporate designs which maximise efficient use of water resources through rainwater harvesting, greywater recycling and SuDS, for example. Therefore, a major positive impact on water resources within the Plan area could be expected through the district-wide implementation of this policy (SA Objective 12). Furthermore, the integration of SuDS into new developments, as well as implementation of GI, would be anticipated to help reduce the risk of surface water flooding, and therefore a minor positive impact on flooding could be expected (SA Objective 5).
- D.1.2.4 This policy outlines that development proposals should follow ‘best practice’ protocols to protect soils from compaction, pollution and erosion during the construction phase and to avoid unnecessary sterilisation of soil resources. Policy DPS2 is therefore expected to have a minor positive impact on natural resources within the Plan area, through seeking to protect this finite resource (SA Objective 6).
- D.1.2.5 This policy seeks to improve energy efficiency of developments which could lead to the reduction of overall carbon emissions of the Plan area and help mitigate climate change. This will likely help contribute to national carbon emission targets and therefore a minor positive impact on climate change and transport could be expected (SA Objective 10).
- D.1.2.6 Through seeking to ensure that new developments avoid designs which would lead to overheating events and by ensuring other high quality design aspects are implemented, such as greywater recycling which would reduce the chance of pollution of local watercourses and improve river ecosystems and habitats, a minor positive impact on the site end users’ health and wellbeing and biodiversity could be expected (SA Objectives 2 and 7).

D.1.3 Policy DPS3: Renewable and Low Carbon Energy Schemes

DPS3: Renewable and Low Carbon Energy Schemes

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

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

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

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

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS3	0	0	0	0	0	+	-	-	0	0	++	0	0	0

D.1.3.1 Policy DPS3 sets out the Council’s support for renewable and low carbon energy projects and sets out criteria for any future wind energy developments to minimise adverse impacts on the environment.

D.1.3.2 The promotion of renewable or low carbon technologies, including small community-led schemes incorporated within new development as advocated within Policy DPS3, would help to facilitate a decreased reliance on energy that is generated from unsustainable sources,

such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of greenhouse gases (GHGs) that are emitted into the atmosphere. This in turn would reduce Mid Sussex's contribution towards the causes of climate change. This policy would therefore be likely to have a major positive impact on Mid Sussex's renewable energy resources by seeking opportunities to utilise renewable and low carbon energy sources (SA Objective 11).

D.1.3.3 Additionally, through ensuring appropriate plans and mechanisms are *“in place for the removal of the installation on cessation of generation and restoration of the site to either its original use or an acceptable alternative use”*, the policy will help to ensure the best use of land and support the redevelopment of previously developed land. Therefore, a minor positive impact on natural resources within the Plan area (SA Objective 6) could be expected.

D.1.3.4 Although Policy DPS3 seeks to ensure that any adverse impacts *“can be made acceptable”* on landscape settings and biodiversity assets within the Plan area, renewable energy and low carbon schemes supported by the policy could have potential adverse impacts on these receptors, particularly in the short-term. The Plan area contains several features which are notably sensitive to developments of this nature, including the High Wealds AONB and the South Downs National Park. Therefore, using the precautionary principle, a minor negative impact has been identified for SA Objectives 7 and 8.

D.1.4 Policy DPS4: Flood Risk and Drainage

DPS4: Flood Risk and Drainage

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

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

Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development¹ unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality.

Arrangements for the long-term maintenance and management of SuDS should also be identified.

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

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

DPS4: Flood Risk and Drainage

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

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS4	0	0	0	0	++	0	+	+	0	0	0	+	0	0

D.1.4.1 Policy DPS4 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding from a range of sources. Developments “*will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere*” as well as use the Council’s SFRA to inform the development. Additionally, the implementation of SuDS in developments of over ten dwellings (or equivalent mixed use) would help to reduce the risk of surface water flooding. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on reducing flood risk would be anticipated (SA Objective 5).

D.1.4.2 Through providing criteria and a ‘preferred hierarchy’ to manage surface water drainage on development sites and by ensuring any SuDS implemented do not adversely affect ground and surface water quality, a minor positive impact on water resources (SA Objective 12) could be expected.

D.1.4.3 Policy DPS4 states that “*SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible*”. By seeking to ensure that site proposals consider opportunities to deliver multi-functional benefits to tackle flood risk whilst improving local biodiversity and landscape quality through sensitively designed SuDS, a minor positive impact on SA Objectives 7 and 8 could be expected where habitats for wildlife could be created or protected and local landscapes enhanced.

D.1.5 Policy DPS5: Water Infrastructure and the Water Environment

DPS5: Water Infrastructure and the Water Environment

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

Water infrastructure

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

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

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS5	0	+	0	0	0	0	+	0	0	0	0	++	0	0

D.1.5.1 Policy DPS5 outlines the standards which development proposals must meet in order to be supported, in relation to water infrastructure and the water environment, and covers topics such as water resources, pollution, quantity and foul water/sewage facilities. The policy seeks to only support development proposals “*where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs*” as well as those which would result in a net increase in water supply or sewage treatment facilities to serve development. This policy would be likely to help provide for future increased demand on

water resources and wastewater infrastructure from an increasing population, as well as protecting the water environment from pollution. Overall, a major positive impact on water resources (SA Objective 12) can be expected as a result of this policy.

- D.1.5.2 This policy aims to ensure that development proposals will not result in adverse impacts on water resources or quality. The protection and enhancement of these assets within the Plan area would be likely to have a positive impact on the local ecological network and the health of residents. Good water quality is an essential health requirement for local residents, as well as local fauna and flora associated with river ecosystems. As such, Policy DPS5 would be expected to have a minor positive impact on human health and biodiversity (SA Objectives 2 and 7).

D.1.6 Policy DPS6: Health and Wellbeing

DPS6: Health and Wellbeing

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

In order to maximise opportunities to enable healthy lifestyles, all new development must:

- i. Be of high quality in its design and construction and be set within an attractive environment;
- ii. Be well-designed to ensure legibility of layout and the public realm including through the use of materials;
- iii. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime;
- iv. Prioritise active travel such as walking and cycling and sustainable transport such as public transport;
- v. Incorporate green infrastructure and biodiversity;
- vi. Provide opportunities for both high quality private outdoor space and publicly accessible open and green space;
- vii. Support and facilitate healthy eating including through the provision, where possible, of local and domestic food production such as allotments, community growing spaces and community orchards;
- viii. Be supported by the necessary infrastructure;
- ix. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, socialise and interact;
- x. Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, air quality, crime, access to education and employment, and local amenity; and
- xi. Incorporate measures to provide resilience against the effects of climate change including overheating, flood risk and drought.

Detailed policy requirements are set out elsewhere in this Plan.

Proposals for major residential and major commercial developments* must set out how they address the requirements of this policy as part of a planning application. In order to satisfy this

DPS6: Health and Wellbeing

policy requirement, applicants will need to undertake a screening for a Health Impact Assessment (HIA). If necessary, a full HIA proportionate to the development proposed, will need to be prepared to demonstrate the health outcomes on the health and wellbeing of communities.

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS6	0	++	+	++	+	0	+	+	0	+	0	0	+	+

D.1.6.1 Policy DPS6 aims to help the Council plan for the future needs of the evolving population, including provisions for reducing health inequalities and crime, improving access to education and employment, and incorporating GI into all new development.

D.1.6.2 This policy requires a Health Impact Assessment (HIA) to be carried out for all major residential and commercial developments, as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015² or as amended. This would be likely to ensure potential adverse effects of development on human health and health inequalities are considered and addressed. By promoting a high quality and attractive public realm, this policy would also be expected to encourage physical exercise through active travel, which would benefit physical and mental health, as well as encouraging access to outdoor space and increasing social interaction. The increased provision of open space and GI, as well a focus on tackling noise and air quality issues, would also be expected to improve human health. Overall, a major positive impact on current and future residents' health and wellbeing can be expected (SA Objective 2).

D.1.6.3 The policy states that all new development “*must be designed to achieve healthy, inclusive and safe places*”. Additionally, development proposals should take opportunities “*to increase community connectivity and social inclusion*”, and the policy supports development of new community services such as allotments and public spaces. Therefore, the policy could lead to better social cohesion within the Plan area through inclusive and community-centred design. A major positive impact on community and crime within communities is expected from this policy (SA Objective 4).

² Available at: <https://www.legislation.gov.uk/ukxi/2010/2184/contents/made> [Date Accessed: 25/01/22]

- D.1.6.4 Through seeking to ensure that development proposals “*incorporate green infrastructure and biodiversity*” into the plans, the policy could result in positive impacts on flood risk and biodiversity. Enhanced GI and vegetation coverage would allow for slower water infiltration and runoff, as well as promoting or conserving habitats for wildlife. Policy DPS6 also seeks to ensure developments “*incorporate measures to provide resilience against the effects of climate change including ... flood risk*”. Therefore, a minor positive impact on flooding and biodiversity could result (SA Objectives 5 and 7).
- D.1.6.5 Furthermore, through incorporating enhancements to GI and public open spaces, and delivering high quality well-designed neighbourhoods, the policy could potentially result in a minor positive impact on the character and quality of, and accessibility to, the local landscape (SA Objective 8).
- D.1.6.6 Policy DPS6 seeks to ensure that development proposals prioritise “*active travel such as walking and cycling and sustainable transport such as public transport*”, and therefore through striving to reduce reliance on personal vehicles within the Plan area and subsequent GHG emissions, a minor positive impact on climate change and transport (SA Objective 10) could be expected. Additionally, through increasing active travel provisions, accessibility across the Plan area to essential services including employment opportunities and education could be improved. Therefore, a minor positive impact on education, economic regeneration and economic growth could be expected (SA Objectives 3, 13 and 14).

D.2 Natural Environment and Green Infrastructure

D.2.1 Policy DPN1: Biodiversity, Geodiversity and Nature Recovery

DPN1: Biodiversity, Geodiversity and Nature Recovery

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

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

Biodiversity will be protected and enhanced by ensuring development:

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

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

Soils are important for biodiversity and carbon storage. Soils will be protected and enhanced, including the best and most versatile agricultural land, by development avoiding soil disturbance, compaction and erosion. Development should not result in soil pollution.

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

DPN1: Biodiversity, Geodiversity and Nature Recovery

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN1	0	+	0	0	+	+	++	+	0	+	0	+	0	0

D.2.1.1 Nationally and locally designated biodiversity assets within Mid Sussex include numerous SSSIs and LWSs, and many non-designated biodiversity assets such as priority habitats, hedgerows and veteran trees. Additionally, Ashdown Forest SPA and SAC is located to the north east of the district boundary. Together, these biodiversity and geodiversity assets form a complex ecological network which supports a wide range of flora and fauna. Policy DPN1 would be expected to support development proposals which safeguard biodiversity and geodiversity assets within the Plan area and meet the outlined criteria within the policy, including ‘last resort’ mitigation and compensation measures in line with the mitigation hierarchy. Additionally, through implementation of this policy and Policy DPN2, development proposals will also need to be in accordance with relevant biodiversity net gain standards and guidelines. Achieving biodiversity net gain is a requirement that relies on long term, effective and well-funded strategies. It is anticipated that this policy would have a major positive impact on biodiversity and geodiversity (SA Objective 7) within the Plan area.

D.2.1.2 The protection of biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy would therefore be likely to have minor positive impacts on human health (SA Objective 2), through encouraging habitat restoration and incorporating biodiversity features within developments and supporting green infrastructure initiatives.

D.2.1.3 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

- D.2.1.4 Furthermore, in regard to natural resources (SA Objective 6), the policy also seeks to minimise adverse impacts on soils including BMV agricultural land resulting from development.
- D.2.1.5 Policy DPN1 supports development proposals which “*avoids damage to, protects and enhances the special characteristics*” of nationally protected areas, such as the High Weald AONB. Additionally, by protecting and enhancing biodiversity assets, it would be likely that some key landscape features would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objective 8).

D.2.2 Policy DPN2: Biodiversity Net Gain

DPN2: Biodiversity Net Gain

Development (as defined in legislation) will need to deliver a net gain in biodiversity which will contribute to the delivery of ecological networks, green infrastructure and nature recovery.

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

Principles of Biodiversity Net Gain

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

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

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

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

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

Level of Biodiversity Net Gain

Biodiversity net gain will be calculated and assessed using the Government’s published biodiversity metric.

DPN2: Biodiversity Net Gain

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

A minimum percentage of biodiversity net gain of 20% will be required on Significant Sites DPH5 – DPH8.

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN2	0	+	0	0	+	+	++	0	0	+	0	+	0	0

D.2.2.1 Biodiversity net gain is an approach to development where a site’s biodiversity is left in a better state than it was originally and is currently required at a 10% threshold as specified within the recently enacted Environment Act 2021. Policy DPN2 supports developments which “*demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately*” and proposals which demonstrate adherence to the mitigation hierarchy in relation to firstly protecting biodiversity of the site in question rather than off-site or compensatory gains.

D.2.2.2 Policy DPN2 will likely enhance biodiversity through provision of “*features to encourage biodiversity and pollination within and around the development*”. The policy also seeks to maximise opportunities for biodiversity net gains associated with Biodiversity Opportunity Areas and in accordance with the Local Nature Recovery Strategy, helping to create more abundant and resilient GI and ecological networks. Policy DPN2 also seeks to ensure that ‘significant sites’ within the MSDPR, outlined in Policies DPH5 to DPH8, will provide for a 20% biodiversity net gain. Therefore, through these provisions, Policy DPN2 could be expected to have a major positive impact on biodiversity (SA Objective 7).

D.2.2.3 By potentially improving the quality of natural surroundings through biodiversity net gain within the Plan area, including access to, and views of, nature, Policy DPN2 could have a minor positive impact on site end user’s physical and mental health (SA Objective 2).

D.2.2.4 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the

protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by biodiversity net gain requirements as outlined within Policy DPN2 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore, this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

D.2.3 Policy DPN3: Green Infrastructure

DPN3: Green Infrastructure

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

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

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

Applicants should consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features.

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

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

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

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

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

DPN3: Green Infrastructure

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0

D.2.3.1 Paragraph 20 of the NPPF³ states that “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for ... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation*”.

D.2.3.2 Green Infrastructure (GI) contributes significantly towards high quality natural and built environments. GI is a multi-functional feature with wide-ranging benefits including: helping to mitigate extreme temperatures and flooding; habitat protection and creation; pollution reduction; and providing open land for recreation and breathing space to benefit residents’ physical and mental health.

D.2.3.3 Policy DPN3 aims to ensure the provision and safeguarding of GI and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. The policy would be likely to provide additional habitats and improve connectivity for flora and fauna, including potential for ecological corridors and stepping-stone habitats which provide opportunities for the movement of species and adaptation to climate change. Therefore, this policy would be expected to have a minor positive impact on biodiversity (SA Objective 7).

D.2.3.4 This policy would be likely to have a positive impact on residents’ wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. Additionally, the policy seeks to ensure that developments provide GI which may include integrated green space, providing mixed use environments for site end users, which could potentially provide space for socialisation and

³MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 12/01/22]

community cohesion. A minor positive impact on human health (SA Objective 2) and community and crime (SA Objective 4) can therefore be expected.

D.2.3.5 Increased GI provision and connectivity would be expected to contribute towards improving air quality due to the increased uptake of CO₂ and filtration of pollutants, including those associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Due to this enhanced carbon storage capacity, this policy could potentially help to reduce exposure of human and ecological receptors to transport related GHG emissions within the Plan area and would therefore be expected to have a minor positive impact on climate change and transport (SA Objective 10).

D.2.3.6 The incorporation of GI into development would be likely to help reduce water runoff rates, and as such, reduce the risk of both fluvial and pluvial flooding. GI provision, including blue infrastructure, will also potentially improve water quality of local watercourses and enhance natural storage and flow functions. A minor positive impact on flooding (SA Objective 5) and water resources (SA Objective 12) would therefore be expected.

D.2.3.7 The provision, maintenance and improvement of GI networks would be likely to provide the opportunities to retain and improve the character and appearance of the local landscape and townscape. Additionally, Policy DPN3 states that "*Applicants should consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features*". Therefore, a minor positive impact on landscape can be expected from this policy (SA Objective 8).

D.2.4 Policy DPN4: Trees, Woodland and Hedgerows

DPN4: Trees, Woodland and Hedgerows

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

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

Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.

Development resulting in the deterioration or loss of irreplaceable habitats including ancient woodland and ancient, aged or veteran trees will not be permitted unless there are wholly exceptional reasons and in such circumstances, compensatory measures will be provided.

DPN4: Trees, Woodland and Hedgerows

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

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

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

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

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

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

Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary. A buffer will also be required for ancient, aged and veteran trees and should be at least 15 times larger than the diameter of the tree or 5m from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. Buffer zones should contribute to green infrastructure and wider ecological networks and consist of a semi-natural habitat with appropriate planting. These requirements for an ancient woodland or tree buffer will apply unless superseded by a more environmentally favourable national standard set out in legislation or guidance.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN4	-	+	0	0	+	+	++	+	+	+	0	+	0	0

- D.2.4.1 Mid Sussex has a large abundance of woodland, with two thirds of the district’s woodland resources occupied by areas of ancient woodland⁴, with particularly large stands of ancient woodland located in the north west of the district. Trees, woodland and hedgerows form a main component of the district’s GI and have important biodiversity and human health benefits, as well as helping to increase resilience against climate change such as through removing carbon dioxide from the air, carbon storage and flood alleviation.
- D.2.4.2 By aiming to protect and enhance the abundance of trees, woodland and hedgerows within the Plan area from development related pressures, Policy DPN4 would be likely to protect and improve existing habitats for wildlife and ecological networks. Additionally, the policy supports proposals where developers secure “*appropriate long-term management arrangements*” of these ecological assets and provides exemptions where, as a last resort, developers must compensate for any ecological assets lost. Therefore, a major positive impact on local biodiversity (SA Objective 7) can be expected.
- D.2.4.3 The policy restricts development on areas which are currently occupied by woodland and seeks to locate development “*as far as possible from ancient woodland*”, which may reduce the number of potential sites, and their yield, within the district. Therefore, a minor negative impact on housing provision (SA Objective 1) could be expected from this policy.
- D.2.4.4 Policy DPN4 supports “*the protection and enhancement of trees, woodland and hedgerows*” and encourages the planting of new trees. By protecting and enhancing these natural assets which currently make up a large proportion of the district’s area and therefore contribute towards the experience of residential life within the district, the policy would likely enhance residents’ access to, and views of, a diverse range of habitats and potentially lead to improvements in mental and physical health. Policy DPN4 therefore is expected to have a minor positive impact on health and wellbeing within the Plan area (SA Objective 2).
- D.2.4.5 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction, filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses. The potential protection and enhancement of biodiversity features as outlined within Policy DPN4 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.
- D.2.4.6 Policy DPN4 will not support development that “*will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance*”, such as the High Weald AONB. By protecting and enhancing biodiversity

⁴Mid Sussex District Council (2021) Nature Conservation and Landscape. Available at: <https://www.midsussex.gov.uk/environment/nature-conservation-and-landscape/> [Date Accessed: 31/01/22]

assets, it would be likely that the character and/or setting of some key landscape features, and cultural heritage features, would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objectives 8 and 9).

D.2.5 Policy DPN5: Historic Parks and Gardens

DPN5: Historic Parks and Gardens

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN5	0	0	0	0	0	0	+	+	+	0	0	0	0	0

D.2.5.1 This policy would be expected to help ensure that *"the character, appearance and setting of historic parks and gardens, or park or garden of special local historic interest"* within the Plan area are protected from development related threats and pressures. Policy DPN5 outlines that development which is located within or adjacent to the asset will be permitted only where it *"protects and enhances its special features, setting and views into and out of the park or garden"*. Therefore, this policy would be expected to have minor positive impacts on cultural heritage within Mid Sussex (SA Objective 9). Additionally, through protecting these parks and gardens, which would likely have some biodiversity and landscape value, a minor positive impact on local biodiversity and landscape settings would be expected (SA Objectives 7 and 8).

D.2.6 Policy DPN6: Pollution

DPN6: Pollution

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

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

DPN6: Pollution

Development proposals will need to take into account the Council’s published guidance.

Detailed policy requirements are set out in Policies:

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN6	0	+	0	0	0	+	+	0	0	0	0	+	0	0

D.2.6.1 Policy DPN6 states that development proposals within the Plan area which are likely to lead to various pollution impacts and hazards will not be supported, and that mitigation measures must be undertaken for development proposals likely to lead to air, noise, vibration, light, water, soil, odour, dust or any other pollutants. The policy refers to adherence to other related policies within the Plan, and requires that all development proposals should consider the Council’s published guidance on the topic of avoiding and mitigating pollution.

D.2.6.2 Through seeking to ensure that development proposals adhere to pollution guidance and regulations, Policy DPN6 is likely to have many benefits relating to human health and the protection of natural resources, wildlife and watercourses. A minor positive impact on SA Objectives 2, 6, 7 and 12 is therefore expected from this policy.

D.2.7 Policy DPN7: Noise Impacts

DPN7: Noise Impacts

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

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

Development will only be permitted where it:

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

DPN7: Noise Impacts

Development will be expected to be located, designed and controlled to avoid or minimise any potential impacts from noise. Development should have good acoustic design including orientating or organising buildings (including consideration of the internal layout of buildings) to locate more noise sensitive areas, such as the principal habitable rooms, away from potential sources of noise. Parking arrangements should be carefully considered to avoid noise and headlight nuisance.

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

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

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN7	0	+	0	0	0	0	+	+	+	0	0	0	0	0

D.2.7.1 Mid Sussex is a largely rural district where high standards of amenity and tranquillity are a key part of life for residents. Policy DPN7 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any noise impacts, including being of “*good acoustic design*”. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of noise pollution. This would be expected to have benefits on mental health and wellbeing of residents, and therefore have a minor positive impact on SA Objective 2.

D.2.7.2 By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to noise. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).

D.2.7.3 Policy DPN7 seeks to protect areas that are “*valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting*”, such as the High Weald AONB.

The policy therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

D.2.8 Policy DPN8: Light Impacts and Dark Skies

DPN8: Light Impacts and Dark Skies

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

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

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

- the minimum amount of lighting necessary to achieve its purpose is specified or otherwise justified on safety or security grounds; and
- the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character; and
- the means of lighting would be unobtrusively sited and well-screened by landscaping; and
- low energy lighting is used; and
- there would not be an adverse impact on wildlife such as through consideration of the appropriate colour of lighting.

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN8	0	+	0	0	0	0	+	+	+	0	0	0	0	0

D.2.8.1 Policy DPN8 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any light pollution impacts, where development proposals are required to ensure that “*the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character*”, for example. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of

illumination. This would help ensure day to day life is not impacted (for example local residents' sleep routine) and will be expected to have benefits on mental health and wellbeing of residents, and therefore result in a minor positive impact on SA Objective 2.

D.2.8.2 By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to light pollution, such as nocturnal species. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).

D.2.8.3 Policy DPN7 seeks to protect intrinsically dark landscapes, including areas within the High Weald AONB. Additionally, the policy supports illuminations of landmarks or heritage features, where the level and type of illumination enhances these features. Policy DPN7 therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

D.2.9 Policy DPN9: Air Quality

DPN9: Air Quality

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

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

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

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

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

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

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

DPN9: Air Quality

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN9	0	+	0	0	0	0	+	0	0	+	0	0	0	0

D.2.9.1 Air pollution is a significant international and local concern. Policy DPN9 seeks to ensure that development proposals specified within the policy, including those “*within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality*”, would not result in a significant increase in air pollution. The policy sets out criteria for development proposals to meet, including mitigation measures, to be supported by the Plan. Policy DPN9 would be likely to help prevent significant reductions in air quality across the Plan area, and as such, have a minor positive impact on the health and wellbeing (SA Objective 2) of future and current residents through ensuring residents are not exposed to unacceptable levels of air pollution, and supporting GI proposals.

D.2.9.2 Some habitats, including Ashdown Forest SPA and SAC situated in close proximity to Mid Sussex District, are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to reduce the rate of air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. The policy also encourages the use of GI to reduce airborne pollution concentrations, which may further benefit sensitive biodiversity receptors in the area. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying Habitats Regulations Assessment (HRA). Overall, this policy would likely have a negligible impact on sensitive habitats through seeking to mitigate potential air quality impacts rather than aiming to improve air quality within the district (SA Objective 7).

D.2.9.3 Additionally, by supporting sustainable travel and other measures to manage air quality within the Plan area, Policy DPN9 will likely contribute towards reduced levels of transport related GHGs and may therefore have a minor positive impact on climate change and transport (SA Objective 10).

D.2.10 Policy DPN10: Land Stability and Contaminated Land

DPN10: Land Stability and Contaminated Land

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

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN10	0	+	0	0	0	+	+	0	0	0	0	+	0	0

D.2.10.1 Contaminated land could lead to adverse biodiversity and human health impacts through the spread of toxins once 'locked' within the ground. Additionally, development on unstable land could lead to erosion of material, polluting nearby watercourses and has the potential to damage infrastructure and adversely affect human health. This policy aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This would be likely to have a minor positive impact on human health, biodiversity and water resources (SA Objectives 2, 7 and 12).

D.2.10.2 Additionally, the use of remediated contaminated land for development could potentially help prevent development on previously undeveloped land (for example, greenfield land), and therefore, this policy could potentially help prevent the loss of ecologically or

agriculturally valuable soil resources and encourage efficient use of land. This would be expected to have a minor positive impact on natural resources (SA Objective 6).

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D.3 Countryside

D.3.1 Policy DPC1: Protection and Enhancement of Countryside

DPC1: Protection and Enhancement of Countryside

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

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

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

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

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

Economically viable mineral reserves within the district will be safeguarded.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC1	0	+	0	0	0	+	+	+	+	0	0	0	0	0

D.3.1.1 Large areas of Mid Sussex coincide with the South Downs National Park or the High Weald AONB. Outside of these designations, the district remains largely rural with areas of open countryside separating the settlements. Policy DPC1 seeks to protect and enhance the countryside, defined as the area outside of Built-up Area Boundaries (BUABs), and supports development in the countryside providing it “*maintains or where possible enhances the quality of the rural and landscape character of the District*”. This would be expected to limit urbanisation of the countryside and help to prevent coalescence of settlements, maintaining their distinct characters and landscape settings and which could also indirectly protect the

settings of heritage assets located within these areas. Therefore, a minor positive impact on local landscape and cultural heritage settings could be expected (SA Objectives 8 and 9).

D.3.1.2 The policy seeks to protect best and most versatile land (Grades 1, 2 and 3a) from non-agricultural related development, and where this development is deemed necessary, field surveys are required and the lowest quality land within the site should be used. Additionally, Policy DPC1 states that “economically viable mineral reserves within the district” are to be protected from unnecessary sterilisation. Therefore, a minor positive impact on natural resources can be expected from this policy (SA Objective 6).

D.3.1.3 Through protecting and enhancing countryside features, the policy will likely have a minor positive impact on health and wellbeing (SA Objective 2) and biodiversity (SA Objective 7), by helping to maintain the open space nature of the countryside and residents’ access to its features and qualities, leading to mental and physical health benefits whilst protecting the habitats within.

D.3.2 Policy DPC2: Preventing Coalescence

DPC2: Preventing Coalescence

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

Provided it is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside, development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC2	0	0	0	+	0	+	0	++	+	0	0	0	0	0

D.3.2.1 Policy DPC2 aims to ensure that future development would not result in adverse impacts on the existing landscape settings within the Plan area, by not supporting development

proposals which may lead to the coalescence of settlements which would harm their “*unique characteristics*”. By protecting settlements, largely located within the countryside, within the Plan area from the effects of urbanisation and resulting coalescence, a major positive impact on the protection of the local landscape would be expected (SA Objective 8). Through protecting local landscape settings of rural settlements, a minor positive impact on protecting the settings of cultural heritage assets within these locations could also be expected (SA Objective 9).

D.3.2.2 The policy seeks to protect the unique characteristics of settlements within the Plan area and will permit development “*if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.*” Policy DPC2 is likely to protect social cohesion and promote integration of communities; therefore, a minor positive impact on community and crime (SA Objective 4) is expected.

D.3.2.3 By preventing development which would lead to coalescence, Policy DPC2 could indirectly reduce the quantity of undeveloped land lost to development and therefore could have a minor positive impact on natural resources, including through protecting best and most versatile land, within the Plan area (SA Objective 6).

D.3.3 Policy DPC3: New Homes in the Countryside

DPC3: New Homes in the Countryside

1. New homes in the countryside, defined as areas outside the built-up area boundaries, will be permitted in specific circumstances, as set out below:
 - i. Accommodation is essential to enable the operation of an agricultural, forestry or similar rural enterprises requiring full time rural workers to live at, or near, their place of work;
 - ii. In the case of new isolated homes in the countryside, where the design of the dwelling is of exceptional quality, is truly outstanding and would significantly enhance its immediate setting and is sensitive to the character of the local area;
 - iii. Development would involve the subdivision of an existing residential building;
 - iv. The proposed development meets the requirements of Policy DPH2: Sustainable Development – Outside Built-Up Area;
 - v. The proposed development is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside; or
 - vi. Affordable housing in accordance with Policy DPH34: Rural Exception Sites.
2. Permanent agricultural (includes forestry and similar land-based rural enterprise requiring full time rural workers) dwellings will only be permitted to support existing agricultural activities on well-established agricultural units where:
 - i. The need cannot be fulfilled by another existing dwelling on, or any other existing accommodation near to, the agricultural unit; and
 - ii. It can be proven that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times; and

DPC3: New Homes in the Countryside

- iii. It can be proven that the rural enterprise is economically viable. This should include demonstrating that the enterprise has been established continuously for the previous three years and profitable for at least one of them; and
- iv. It can be proven that the size and location of the dwelling is commensurate with the established functional requirement of the agricultural unit.

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

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

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

3. Re-use of rural buildings for residential use

The re-use and adaptation of rural buildings for residential use in the countryside will be permitted where it is not a recently constructed¹ agricultural building which has not been or has been little used for its original purpose and:

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

4. Replacement dwellings in the countryside

Replacement dwellings in the countryside will be permitted where:

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

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

¹The term 'recently constructed' will generally be held to apply to buildings constructed within five years of a planning application for their re-use or adaptation.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC3	+	0	0	0	0	0	0	+	+	0	0	0	0	+

D.3.3.1 Policy DPC3 sets out criteria for residential development to meet if located within the countryside (outside of defined BUABs). The policy supports proposals where special justification exists, and allows for the re-use and adaptation of rural buildings to meet the diverse housing need. This policy could therefore potentially contribute towards a minor positive impact on housing provision (SA Objective 1).

D.3.3.2 Through permitting the “*re-use and adaptation of rural buildings*” where proposals secure the future of a heritage asset and enhance the landscape setting of the area, the policy could potentially help to rejuvenate old or dilapidated buildings and restore their historic significance. A minor positive impact on the local landscape and cultural heritage assets could be expected (SA Objectives 8 and 9).

D.3.3.3 Policy DPC3 sets out guidelines for permitting agricultural dwellings and sets out the exceptional circumstances in which they would be supported. This policy would be anticipated to have a minor positive impact by helping to ensure that rural workers are able to live in a location that permits access into their place of work, reducing time spent commuting, and thereby supporting the rural economy (SA Objective 14).

D.3.4 Policy DPC4: High Weald Area of Outstanding Natural Beauty

DPC4: High Weald Area of Outstanding Natural Beauty

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

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

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

DPC4: High Weald Area of Outstanding Natural Beauty

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC4	-	0	0	+	0	0	+	++	+	0	0	0	0	+

- D.3.4.1 This policy would be expected to support development within the High Weald AONB “*where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan*”, including landscape features and their setting, applying a landscape-led design approach. Additionally, development proposals located within the AONB should be located and designed to ensure there is no significant adverse impact on landscape character and views into and out of the AONB. This policy would be likely to help protect the distinctiveness of the nationally important landscape of the AONB for future generations, and therefore, major positive impacts on the landscape character of the High Weald AONB would be expected (SA Objective 8).
- D.3.4.2 The High Weald AONB is an ancient landscape comprised of small and irregular shaped fields, scattered farmsteads and ancient routeways. Policy DPC4 aims to support development proposals that conserve and enhance the historic landscape and historic settlement pattern. The protection afforded to the AONB under this policy would therefore be anticipated to have a minor positive impact on cultural heritage (SA Objective 9), by helping to provide protection to the character and setting of locally and nationally important heritage assets within the AONB.
- D.3.4.3 This policy would support development within the High Weald AONB which “*support the land-based economy and social well-being of local communities within the AONB*”, whilst being compatible with conservation aims, which could lead to minor positive impacts on community cohesion (SA Objective 4) and the local economy (SA Objective 14), through localised developments for community use.
- D.3.4.4 Policy DPC4 seeks to support development which conserves and enhances natural beauty, including the conservation of wildlife. By protecting areas of high biodiversity value, and

incorporating measures such as the protection of dark skies within the AONB with likely benefits for nocturnal species, a minor positive impact on biodiversity would be expected (SA Objective 7).

D.3.4.5 However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the High Weald AONB, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

D.3.5 Policy DPC5: Setting of the South Downs National Park

DPC5: Setting of the South Downs National Park

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

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

Policy Reference	1 Housing	2 Health & Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change & Transport	11 Energy & Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
DPC5	-	0	0	0	0	0	+	++	0	0	0	0	0	0

D.3.5.1 Policy DPC5 regards the protection of the visual and special qualities, tranquillity and essential characteristics of South Downs National Park from development that goes against the criteria identified within the Policy. The National Park comprises large swathes of primarily open countryside, and therefore this policy would be likely to have a major positive impact on protecting the setting and characteristics of this important landscape (SA Objective 8).

D.3.5.2 By supporting development which is consistent with the purposes of the South Downs National Park, which includes current aims of increasing land managed for nature from 25% to 33% by 20305, this policy would be likely to contribute towards the protection and

⁵South Downs National Park Authority (2022) Call for Nature Sites. Available at: <https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/call-for-nature-sites/> [Date Accessed: 14/01/21]

enhancement of ecological networks. Special qualities of the park include areas which possess high value biodiversity, and by protecting these assets, a minor positive impact on biodiversity is expected (SA Objective 7).

D.3.5.3 However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the South Downs National Park, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

D.3.6 Policy DPC6: Ashdown Forest SPA and SAC

DPC6: Ashdown Forest SPA and SAC

In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

Recreational pressure

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

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

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

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

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

Air quality

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC6	0	+	0	0	0	0	+	+	0	+	0	0	0	0

D.3.6.1 Ashdown Forest SPA and SAC is located on the outskirts of the Mid Sussex District boundary to the north east, within the High Weald AONB. Policy DPC6 aims to protect this designated Habitats site from development related impacts through providing distance thresholds and criteria for development proposals to adhere to, in accordance with the SANG and SAMP schemes⁶.

D.3.6.2 This policy sets out that development proposals within 400m of Ashdown Forest SPA and SAC will not be permitted, and development proposals which would lead to a net increase in dwellings within a 7km zone of influence around the designation will be required to contribute to physical and financial mitigation as outlined within the policy. It is expected that this policy would help to protect important biodiversity assets within the designated Habitats site from adverse impacts caused by development. Through protecting the qualifying features of Ashdown Forest, as well as other important biodiversity assets within the area, a minor positive impact on biodiversity and geodiversity (SA Objective 7) would be expected. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying HRA.

D.3.6.3 Additionally, through aiming to protect Ashdown Forest SPA and SAC within the identified distance thresholds, a minor positive impact on the surrounding landscape, such as the High Weald AONB, could be expected (SA Objective 8).

D.3.6.4 The protection of these biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats, as provided by Ashdown Forest, is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. Through protecting this area from development related threats and pressures, current and future residents can continue to enjoy these benefits and therefore the policy would be likely to have a minor positive impact on human health (SA Objective 8).

⁶ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Date Accessed: 27/01/22]

- D.3.6.5 Development proposals for housing within the identified 7km zone of influence will be required to provide “*Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to a strategic SANG*” as part of the mitigation as set out within the policy. By providing alternative accessible greenspace to Ashdown Forest, Policy DPC6 could potentially result in an indirect minor positive impact on climate change and transport (SA Objective 10) where road traffic and potential congestion around Ashdown Forest is reduced through visitors deciding to use other greenspace instead for recreation.

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D.4 Built Environment

D.4.1 Policy DPB1: Character and Design

DPB1: Character and Design

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

All applicants will be required to demonstrate that development:

Understanding the Context

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

Layout, Streets and Spaces

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

Establishing the Structure

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

High Quality Building Design

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

Residential Amenity

- xii. does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook,

DPB1: Character and Design

daylight and sunlight, and noise, air and light pollution (see Policies DPN6, DPN7, DPN8 and DPN9).

Further information and guidance on supporting the delivery of high-quality new development, including design principles, can be found in the District Council’s Design Guide Supplementary Planning Document.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB1	0	+	0	++	+	+	+	+	+	+	+	0	0	0

D.4.1.1 Effective design can help to ensure new developments are well integrated into the surrounding landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance quality of life for residents, strengthen sense of place, improve the attractiveness of a location and create safer places to live and work.

D.4.1.2 Building for Life 12⁷ is a government endorsed design quality indicator for well-designed developments. This guidance should be used by local authorities to help guide design codes within the Plan area. Policy DPB1, alongside the guidance provided within this document, would help to ensure all new development within the Plan period is of high quality and design.

D.4.1.3 Policy DPB1 seeks to ensure development designs incorporate various features including open areas to “animate and provide natural surveillance”, which would potentially help to discourage crime and reduce the fear of crime within the community. Additionally, the policy seeks to encourage community interaction through supporting proposals with layouts to exhibit a strong neighbourhood focus/centre, with larger (500+ dwellings) residential schemes being expected to incorporate a ‘mixed-use’ element, for example including leisure centres and schools. The policy is likely to encourage community cohesion and interaction and promote community-based provisions through well planned design, therefore, a major positive impact on aspects of community and crime within the Plan area is expected (SA Objective 4).

D.4.1.4 Under this policy, improvements to pedestrian and cycle network and opens spaces would be required, which, in addition to encouraging physical exercise, would be expected to

⁷ D. Birkbeck and S. Kruczowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Date Accessed: 17/01/22]

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

- D.4.1.5 The policy supports development which *“incorporates sustainable construction principles and is designed for adaptation and future weather events”*, additionally, proposals which incorporate a green infrastructure plan that *“maximises opportunities to retain existing trees and incorporate new trees”* where vegetation would help absorb excess water during flood events. Through encouraging the incorporation of these aspects into future developments, the policy is likely to have a minor positive impact on reducing flood risk (SA Objective 5) within the Plan area. Additionally, the policy may create new habitats and improve connectivity for wildlife through the provisioning of trees and GI, which may have a minor positive impact on biodiversity (SA Objective 7).
- D.4.1.6 Policy DPB1 seeks to *“optimise the potential”* of a site, especially where a site is previously developed, promoting an efficient use of land, which could reduce the amount of best most versatile land lost to development in other areas of the district. Therefore, a minor positive impact on natural resources (SA Objective 6) could be expected.
- D.4.1.7 High quality design would help to ensure that new development does not have an adverse effect on the local landscape. Policy DPB1 seeks to ensure that new development reflects *“the distinctive character of the towns and villages and protects their separate identity and valued townscapes”*, as well as being sensitive to countryside surroundings. Therefore, a minor positive impact on landscape is expected (SA Objective 8). Additionally, through ensuring that future developments reflect the distinctive character of the local surroundings and consider views onto the development, the settings of local heritage assets (such as Listed Buildings) could be conserved or enhanced and therefore a minor positive impact on cultural heritage (SA Objective 9) could result.
- D.4.1.8 The policy sets out that development proposals should be *“organised around green transport principles”* and should *“create a pedestrian and cyclist friendly layout that is safe, well connective, legible and accessible”*, whilst being in a location with good public transport links, as well as considering amenity issues such as air pollution. Therefore, the policy is likely to improve access to work and services by public transport, walking or cycling, as well as helping to protect air quality. A minor positive impact on climate change and transport (SA Objective 10) could be expected.

D.4.1.9 The criteria of high-quality design set out by Policy DPB1 includes the incorporation of “*sustainable construction principles*” into development proposals, which could include use of local materials, recycling or aims of net-zero emissions during the construction phase of development. A minor positive impact on energy and waste (SA Objective 11) could be expected from this aspect of the policy.

D.4.2 Policy DPB2: Listed Buildings and Other Heritage Assets

DPB2: Listed Buildings and Other Heritage Assets

Listed Buildings

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

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

Other Heritage Assets

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB2	0	0	0	0	0	0	0	+	++	0	0	0	0	0

D.4.2.1 The diverse range of heritage assets throughout the Plan area provides a strong sense of place and character to their surroundings. This policy requires new development to “*protect listed buildings and their settings*” and “*conserve heritage assets in a manner appropriate to their significance*”, including archaeological, architectural, artistic or historic significance, for the enjoyment of future generations in the district and contribution to residents’ quality of life.

D.4.2.2 This policy sets out criteria for which development proposals should adhere to in regard to protecting historic assets. Therefore, a major positive impact on the historic environment would be anticipated (SA Objective 9).

D.4.2.3 Through protecting heritage assets within the Plan area, this policy would be likely to have a minor positive impact on the local landscape character (SA Objective 8), for example through the requirement to use traditional construction materials and techniques, which may also help to conserve the setting of high quality landscapes such as the High Weald AONB.

D.4.3 Policy DPB3: Conservation Areas

DPB3: Conservation Areas

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

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

DPB3: Conservation Areas

- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB3	0	0	0	0	0	0	0	+	+	0	0	0	0	0

D.4.3.1 There are 36 Conservation Areas (CAs) located within the Mid Sussex District, concentrated in various settlement areas such as East Grinstead, Haywards Heath and Burgess Hill. Policy DPB3 seeks to ensure, through various criteria, that development within each of these CAs “conserve or enhance its special character, appearance and the range of activities which contribute to it” and that development “will also protect the setting of the conservation area and in particular views into and out of the area”. Therefore, where heritage assets within CAs are conserved and/or enhanced through this policy, a minor positive impact on cultural heritage (SA Objective 9) can be expected.

D.4.3.2 Through aiming to protect and conserve CAs and their settings, a minor positive impact on the local landscape within the Plan area can be expected, where the special characteristics and qualities of affected landscapes and townscapes will benefit from this policy (SA Objective 8).

D.5 Transport

D.5.1 Policy DPT1: Placemaking and Connectivity

DPT1: Placemaking and Connectivity

Development shall be delivered sustainably and provide appropriate infrastructure to support the objectives of the West Sussex Transport Plan 2022-2036.

To meet these objectives:

- a) Development that is likely to have a significant impact on the transport network shall provide a Transport Assessment / Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.
- b) All relevant sustainable travel interventions (for the relevant local network) shall be fully explored and be taken into account in terms of their level of mitigation before considering highway infrastructure mitigation.
- c) Development shall integrate relevant requirements of Chapter 4 of the Mid Sussex Design Guide and be designed to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond; before the highway layout is planned.
- d) Create attractive, healthy places that have a permeable street network within the site with clearly defined route hierarchies that are safe and designed for all users and supporting opportunities for people to choose not to travel by car.
- e) New streets shall be designed to adoptable standard which can easily incorporate Gigabit capable full-fibre or equivalent digital infrastructure, to expand the Local Full Fibre Network (LFFN) in the district.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT1	0	+	0	+	0	0	0	0	0	+	0	0	0	+

D.5.1.1 Mid Sussex is a largely rural district where a large proportion of residents currently rely on personal vehicles to access community services and facilities. Policy DPT1 seeks to ensure that future development meets the objectives as set out within the emerging West Sussex Transport Plan 2022-2036⁸, by providing relevant criteria for proposals to achieve in order to attain sustainable transport focused infrastructure within the Plan area. The policy

⁸ West Sussex County Council (2021) West Sussex Transport Plan 2022 to 2036. Available at: <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/> [Date Accessed: 27/01/22]

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

D.5.1.2 Policy DPT1 supports active transport measures where developments are expected to improve walking and cycle routes and links within the Plan area, which would likely have mental and physical health benefits for site end users. Additionally, enhanced active and transport links could improve residents' access to community facilities, for example shops, libraries and GP services. Therefore, a minor positive impact on health and wellbeing and community, community and crime could result (SA Objectives 2 and 4).

D.5.1.3 The policy states that new streets within developments “*shall be designed to adoptable standard which can easily incorporate Gigabit capable full-fibre or equivalent digital infrastructure, to expand the Local Full Fibre Network (LFFN) in the district*”. This aspect could enhance the home working experience and lead to positive impacts on economic growth, by increasing the range of employment opportunities within the Plan area, as well as benefitting local businesses with faster internet connectivity. A minor positive impact on economic growth could therefore be expected (SA Objective 14).

D.5.2 Policy DPT2: Rights of Way and Other Recreational Routes

DPT2: Rights of Way and Other Recreational Routes

Rights of way, Sustrans national cycle routes and recreational routes will be protected by ensuring development does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes.

Access to the countryside will be encouraged by:

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT2	0	+	0	0	0	0	0	+	0	+	0	0	0	0

D.5.2.1 Policy DPT2 seeks to protect existing Public Rights of Way and other recreational routes from development related threats and pressures by ensuring development “*does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes*”. The policy also provides criteria to ensure that development proposals encourage access to the countryside for site end users.

D.5.2.2 Access to a diverse range of natural habitats is known to have benefits for mental and physical wellbeing and could potentially encourage residents to engage in a more active lifestyle, as well as facilitating better access to the surrounding landscape. By helping to protect these important recreational and active transport assets for future generations, a minor positive impact on human health and wellbeing, landscape and climate change and transport could be expected (SA Objectives 2, 8 and 10).

D.5.3 Policy DPT3: Cycling

DPT3: Cycling

Development will be required to help remove barriers to cycling and create a healthy environment in which people chose to cycle; facilitated by:

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT3	0	+	0	+	0	0	0	0	0	+	0	0	0	0

D.5.3.1 This policy seeks to improve access to cycling facilities by requiring developments to provide “*high quality, fit for purpose cycleways within the development which wherever possible link to the existing cycle network*” and to build upon various cycling infrastructure schemes. By also ensuring that new developments provide cycle parking facilities, positive impacts on health and wellbeing could result where more people are likely to take up cycling as a form of recreation or active transport. Additionally, by providing cycleways and linking these to the existing cycle network, better access to community facilities could result as well as a reduction of the reliance on personal vehicles for transport. Therefore, a minor positive impact on health and wellbeing, community and equality and climate change and transport could result (SA Objectives 2, 4 and 10).

D.5.4 Policy DPT4: Parking and Electric Vehicle Charging Infrastructure

DPT4: Parking and Electric Vehicle Charging Infrastructure

Development will be required to:

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT4	0	0	0	0	0	0	0	0	0	+	0	0	0	0

D.5.4.1 Policy DPT4 seeks to ensure that all new developments provide “*adequate and well-integrated car parking*”, good “*accessibility of the site to services and sustainable travel infrastructure*” (depending on type, mix and use of the development) and that Electric Vehicle Charging points are provided in car parking for non-residential developments. The policy would be expected to facilitate an increased number of residents using more sustainable modes of transport, such as electric vehicles, which may ultimately reduce the level of GHGs emitted from private cars and subsequently their impact on climate change. Therefore, a minor positive impact on climate change and transport within the Plan area could be expected (SA Objective 10).

D.6 Economy

D.6.1 Policy DPE1: Sustainable Economic Development

DPE1: Sustainable Economic Development

Sustainable Economic Development will be achieved by:

- Encouraging high quality development of land and premises to meet the needs of 21st century businesses;
- Supporting existing businesses, and allowing them room to expand;
- Encouraging inward investment, especially the location, promotion and expansion of clusters or networks of knowledge and data driven, creative or high technology industries; and
- Seeking the appropriate infrastructure to support business growth – in particular high speed broadband connections
- Ensuring major development proposals (including Significant Sites allocated within this District Plan) demonstrate how they will contribute to addressing identified local skills shortages. Opportunities should be taken to support local employment, skills development and training.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE1	0	0	0	+	-	-	-	-	-	0	-	-	++	++

D.6.1.1 Policy DPE1 sets out the Council’s criteria to achieve sustainable economic development throughout the Plan area in relation to business growth and infrastructure. Through supporting existing businesses and allowing them to expand if required, as well as ensuring infrastructure within the district can provide for future business growth, further employment opportunities could be provided, and economic growth encouraged. The policy also seeks to ensure that major development proposals (for example the Significant Sites as identified within the plan, can demonstrate “*how they will contribute to addressing identified local skills shortages*”. The policy supports employment for local residents and their development of skills through means such as training, which could improve accessibility into the local jobs market. A major positive impact on the economic objectives would therefore be expected through this policy (SA Objectives 13 and 14).

D.6.1.2 Through supporting business expansion, the policy could allow for smaller community-based businesses to grow and potentially increase residents’ access to community facilities such as pubs, shops and hairdressers, which may also lead to better community cohesion through

use of these businesses. Therefore, a minor positive impact on the community focused objective (SA Objective 4) could be expected.

- D.6.1.3 Policy DPE1 supports the general expansion of businesses which could lead to impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, without further information. The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

D.6.2 Policy DPE2: Existing Employment Sites

DPE2: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

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

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

- (i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and
- (ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.

Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses causes, or would lead to site-specific, environmental problems, such as noise, pollution or disturbance through traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.

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

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace. Proposals for alternative uses, with the exception of residential use, within Existing

DPE2: Existing Employment Sites

Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

Existing Employment Areas – Expansion

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE2	0	0	0	0	-	-	-	-	-	0	-	-	++	++

D.6.2.1 Policy DPE2 supports the protection and expansion of existing employment areas and provides criteria for these development proposals to meet in order to be supported by the Council. The policy would protect existing employment sites allocated for ‘general industrial’ or ‘storage and distribution’ uses, and proposals which would lead to a loss in these employment areas would be resisted, unless it can be “*clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use*”.

D.6.2.2 Additionally, the policy supports proposals for intensification within the boundary of Existing Employment Sites, provided it is in accordance with other development plan and national policies. By protecting these key employment areas from non-employment related re-development (for example residential developments), local jobs are protected. Policy DPE2 supports in-principle the expansion of Existing Employment Sites within the identified built-up areas, and also supports expansion of Existing Employment Sites outside of built-up areas where certain criteria are met. Overall, major positive impacts can be expected relating to economic regeneration and economic growth through the protection and enhancement of key employment areas (SA Objectives 13 and 14).

D.6.2.3 Policy DPE1 supports the expansion of Existing Employment Areas, and although proposals are required to meet criteria to help avoid negative impacts, impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, cannot be ruled out without further information. The assessment of sites has identified a range of sustainability impacts in regard to SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

D.6.3 Policy DPE3: Employment Allocations

DPE3: Employment Allocations

To support balanced communities and to provide opportunities for people to work close to where they live, employment land will be required to be provided on Significant Sites:

- DPH5: Land at Ansty Farm, Cuckfield Road, Ansty
- DPH7: Land to South of Reeds, Sayers Common
- DPH8: Land at Crabbet Park

Development must be in accordance with the site-specific requirements set out in the policies above.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE3	0	+	0	+	-	-	-	-	-	-	-	-	+	+

D.6.3.1 Policy DPE3 sets out the ‘Significant Sites’ allocated within the draft Plan, and the requirement for these sites to include provision of employment land to help cater for the needs associated with large number of dwellings proposed, by providing employment and local business opportunities. The proposed employment areas within these sites will include retail and commercial opportunities as well as services (as defined within Class E). Mid Sussex is a largely rural district and through providing the local area surrounding these three sites with greater accessibility to employment opportunities, facilities and services, a minor positive impact on residents’ health and wellbeing, access to community and local economic regeneration and growth could be expected (SA Objectives 2, 4, 13 and 14).

D.6.3.2 Please note: The pre-mitigation assessments of the sites (see Appendix C) have identified potential negative impacts resulting from the development of the employment areas within these sites. These constraints relate to flood risk, natural resources (including mineral safeguarding areas), biodiversity, landscape settings, cultural heritage settings and assets,

traffic related emissions, waste production and water resources (including nearby watercourses). Therefore, minor negative impacts have been identified for SA Objectives 5, 6, 7, 8, 9, 10, 11 and 12. Site-specific requirements provided within the site policies, as referred to within Policy DPE3, would be likely to largely address these adverse impacts. These site-specific policies will be assessed as required at a later date and may influence the assessment of Policy DPE3.

D.6.4 Policy DPE4: Town and Village Centres

DPE4: Town and Village Centres

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

Table XX

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

Town and Village Centre Boundaries

Town and Village Centre Boundaries for each settlement in the hierarchy are defined on the Policies Maps and are shown in Appendix xx.

Sequential Test for Town Centre Uses

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

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

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

DPE4: Town and Village Centres

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

Local Threshold for Retail Impact Assessments

Planning applications proposing the construction of 500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE4	0	+	0	+	0	0	0	0	0	0	0	0	+	+

- D.6.4.1 Policy DPE4 sets out the hierarchy of centres within Mid Sussex including town centres and village centres, and proposed ‘sequential test’, in order to help ensure that development proposals are of appropriate use and scale depending on the needs and capacity of the area.
- D.6.4.2 This policy aims to support and strengthen the identified hierarchy of centres. This would be expected to provide benefits at the local community scale, in terms of residents’ access to local services and facilities, and well as strengthening the local economy. In addition, this policy would be expected to support and protect key retail areas through ensuring that development proposals of “500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area”. Therefore, a minor positive impact on economic regeneration and growth within the Plan area could be expected (SA Objectives 13 and 14).
- D.6.4.3 Through supporting development within a town or village centre, as defined within the table within the policy, residents are more likely to have greater access to facilities and services within their local area. Additionally, by supporting local businesses and the local economy, this policy would be expected to have positive impacts on the health and wellbeing of residents. Therefore, minor positive impacts on SA Objectives 2 and 4 could be expected.

D.6.5 Policy DPE5: Within Town and Village Centre Boundaries

DPE5: Within Town and Village Centre Boundaries

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE5	0	0	0	+	0	0	0	0	0	0	0	0	+	0

D.6.5.1 Policy DPE5 seeks to support development of main town centre uses, as defined by the NPPF, and covers other forms of development such as temporary ‘meanwhile’ uses and delivery lockers. By outlining support for appropriate developments within defined Town and Village Centre Boundaries, the policy would likely improve residents’ accessibility to facilities and services which fall within the categories outlined within the policy, and also enhance the viability and vitality of the town centres within the Plan area. Therefore, a minor positive impact on community accessibility and economic regeneration and growth could be expected (SA Objectives 4, 13 and 14).

D.6.6 Policy DPE6: Development within Primary Shopping Areas

DPE6: Development within Primary Shopping Areas

Primary Shopping Areas (PSAs) are defined on the Policies Map and are shown in [Appendix xx](#). For Town Centres, this is a smaller area within the Town Centre boundary. For Village and Local Centres, the PSA corresponds with the Village Centre Boundary.

(1) In order to support thriving Centres in the district, development proposals within defined Primary Shopping Areas, (as shown on the Policies Map), involving the loss of Class E uses will be supported where:

- a) a main town centre use is proposed,

DPE6: Development within Primary Shopping Areas

- b) it can be demonstrated that the proposed use will sustain and enhance the vitality and viability of the centre,
- c) neighbouring amenity is protected,
- d) an active frontage is maintained at ground floor level, and;
- e) it does not result in a concentration of uses that harm the vitality and viability of the centre.

Residential uses will be supported at upper storeys. Residential at ground floor level may in limited circumstances be acceptable where the vitality and viability of the centre is not harmed; and

- a) where it maintains an attractive and active frontage to the public realm, and;
- b) does not cause harm to the character of the streetscene.

2) New developments for retail, food and beverage, and associated services uses (Use Class E(a), (b), (c)) within the Primary Shopping Area will be supported with the implementation of restrictions to maintain the mix of uses as permitted to ensure the vitality and viability of the centre is not harmed.

3) The loss of Class E Uses to alternative non-town centre uses will only be supported where evidence can be provided that demonstrates:

- a) the existing and any alternative Class E use is no longer viable; this must be demonstrated through evidence of vacancy and proactive marketing for an appropriate period of time;
- b) the proposed use would enhance the vitality and viability of the centre, and
- c) it would not result in adverse impacts on neighbouring amenity

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE6	+	+	0	+	0	0	0	+	0	0	0	0	+	0

D.6.6.1 Policy DPE6 aims to support development within designated Primary Shopping Areas which would retain and enhance Class E uses (commercial, business and service), as defined within the policy, as long as the vitality and viability of the centre is not harmed from such proposed development. The policy sets out criteria which development proposals should adhere to for them to be supported, including resisting the loss of Class E uses to alternative non-town centre uses. This policy would likely help to maintain and increase the range of employment opportunities, shops and services available in the town centres across the district and therefore a minor positive impact on economic regeneration is expected (SA Objective 13).

D.6.6.2 This policy supports residential uses in upper storeys of town centre buildings, and in some circumstances the policy supports ground floor residential units. This would likely help to ensure delivery of a range of types, tenures and mix of homes required over the Plan period,

and therefore a minor positive impact on housing provision could be expected (SA Objective 1).

D.6.6.3 Additionally, through responsibly supporting the need of growing communities within town centres, accessibility to services including healthcare and recreation facilities, such as pharmacies and gyms, could be improved. This could result in a positive impact on health and wellbeing and community access (SA Objectives 2 and 4).

D.6.6.4 The policy also sets out the Council's support for town centre developments where they maintain an attractive and active frontage to the public realm. Through resisting development which would "*harm the vitality and viability of the centre*", this policy could potentially result in a minor positive impact on the local landscape character (SA Objective 8).

D.6.7 Policy DPE7: Sustainable Rural Development and the Rural Economy

DPE7: Sustainable Rural Development and the Rural Economy

Provided a development is not in conflict with Policy DP12: Protection and Enhancement of Countryside and DP13: Preventing Coalescence, and the rural location of the enterprise (outside the built-up area boundaries on the Policies Maps) and where it is justifiable to support a prosperous rural economy in accordance with national policy in the NPPF:

- 1) new small-scale* economic development, and extensions to existing facilities, including leisure and tourism-related development, within the countryside will be permitted provided:
 - it supports sustainable growth and the vitality of all types of businesses in the rural economy; and
 - it involves conversion of existing buildings and well-designed new buildings, where possible on previously developed sites; and
 - it maintains or where possible enhances the quality of the rural setting.
- 2) diversification of activities on existing farm units and other land-based rural businesses will be permitted provided:
 - they are of a scale which is consistent to the location of the farm holding; and
 - they would not prejudice the agricultural use of a farm unit.
- 3) the re-use and adaptation of agricultural and forestry buildings for business or sustainable rural tourism and leisure use in the countryside will be permitted provided:
 - the building is genuinely redundant for agricultural or forestry use; and
 - it is not a recently constructed** agricultural building which has not been or has been little used for its original purpose;
 - the building is demonstrated to be structurally sound and capable of conversion without substantial reconstruction or extension;
 - the site is served by an existing suitable access to the local road network; and
 - the appearance and setting are not adversely affected;

Development for accessible local services and community facilities will be supported in line with policy DPI16.

DPE7: Sustainable Rural Development and the Rural Economy

* Small scale defined as being normally no more than 300m² of floorspace.

** Recently constructed is defined as being within the previous five (5) Years.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE7	0	+	0	0	0	0	0	0	0	+	0	0	+	0

D.6.7.1 Mid Sussex District is largely rural, and some of the key rural businesses within Mid Sussex include agriculture, horticulture and forestry. In addition, an increasing number of residents in rural areas are home workers. Policy DPE7 supports various types of rural development including leisure and tourism related development, farm diversification and the re-use and adaptation of farm buildings for business use or sustainable rural tourism, for example, where the policy provides criteria for development proposals to meet in order to be supported.

D.6.7.2 Overall, this policy would be expected to have a minor positive impact on the local economy regeneration and the wellbeing of local residents, by encouraging the provision of rural employment opportunities (SA Objectives 2 and 13). Additionally, by ensuring employment opportunities within the rural areas of Mid Sussex are safeguarded and promoted, this policy could potentially help reduce the need to travel for residents living in these areas, which could result in a minor positive impact on reducing transport related emissions (SA Objective 10).

D.6.8 Policy DPE8: Sustainable Tourism and the Visitor Economy

DPE8: Sustainable Tourism and the Visitor Economy

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

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

- evidence of marketing actively conducted for a reasonable period of time;
- evidence that alternative visitor uses have been fully explored;
- an appraisal indicating that the existing use is no longer viable;
- evidence that the site has not been made deliberately unviable;

DPE8: Sustainable Tourism and the Visitor Economy

- evidence of the suitability of the site to accommodate the alternative visitor use; and
- evidence that the reduction of floorspace or bed spaces in the case of tourism accommodation is the only way of improving the standard of the existing tourist facility.

Development proposals for new tourism accommodation* and attractions, or expansions or improvements to existing tourism accommodation* and attractions, will be supported where it is not in conflict with Policy DPE7: Sustainable Rural Development and the Rural Economy and Policy DPC1: Protection and Enhancement of the Countryside, and where it is demonstrated that:

- It increases the range and/or quality of tourist facilities;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- Opportunities are taken to use existing buildings where possible;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

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

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

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE8	0	+	0	0	0	0	0	0	+	+	0	0	+	+

D.6.8.1 Policy DPE8 aims to promote sustainable tourism and the visitor economy within Mid Sussex through supporting the retainment of existing tourism accommodation as well as development proposals for new tourist accommodation and attractions, in principle, with criteria for such developments to meet in order to be supported. This policy would be likely

to enhance the tourism potential of Mid Sussex and result in an increase in the number of visitors to the Plan area. Increased tourism would be expected to have benefits in relation to the local economy by potentially providing new cultural activities and promote growth in rural areas, therefore a minor positive impact on economic regeneration and growth could be expected (SA Objectives 13 and 14). Additionally, an increase in employment opportunities and a strong local economy would also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 2).

- D.6.8.2 Through safeguarding heritage features such as the Bluebell Railway Link and railway corridor between Horsted Keynes and Haywards Heath, as well as potentially conserving and promoting other cultural heritage features as tourist attractions through this policy, a minor positive impact on cultural heritage within the Plan area could be expected (SA Objective 9).
- D.6.8.3 The policy sets out the requirement for tourist development to encourage sustainable travel opportunities and to ensure that anticipated traffic generation would not result in “*harm on highway safety or severe residual cumulative impacts on the road network*”. Therefore, through encouraging sustainable transport there is potential for tourists to use these transport methods rather than personal vehicles, and a minor positive impact on climate change and transport could be expected (SA Objective 10).

D.7 Housing

D.7.1 Policy DPH1: Housing

DPH1: Housing

The District’s Local Housing Need is 18,581 dwellings over the Plan Period. Provision is also made for 1,000 dwellings to contribute towards the unmet need within the North West Sussex Housing Market area.

Minimum Housing Requirement

The Housing Requirement will be met from the following sources:

Commitments (Existing allocations and Permissions)	11,519
Significant Sites	
DPH5: Land at Ansty Farm, Cuckfield Road, Ansty	1,600
DPH6: Land to West of Burgess Hill	1,400
DPH7: Land to South of Reeds, Sayers Common	1,850
DPH8: Land at Crabbet Park, Copthorne	1,000
Housing Sites DPH9 – DPH29	1,562
Windfall allowance	1,208
<i>Of which sites of fewer than 10 units</i>	1,008
<i>Of which Previously developed sites more than 10 units</i>	200
Total Housing supply from 2021 - 2038	20,139
Mid Sussex Housing Need	18,581
Total under/over supply for resilience and/or wider HMA	+1,558

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH1	++	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0

D.7.1.1 Policy DPH1 sets out the district’s local housing need over the Plan period, against the housing supply identified within the Plan, where the identified housing supply has exceeded minimum dwellings required by 1,558 dwellings. By surpassing the required housing need, the policy would be likely to ensure that there will be sufficient houses to meet the needs of current and future residents, and therefore a major positive impact on housing provision would be expected (SA Objective 1).

- D.7.1.2 Additionally, through providing enough houses to meet the required need, the policy may help to facilitate delivery of a range of housing densities and types, offering more market choice, and residents may feel a sense of wellbeing where their needs can be met. However, there is some uncertainty regarding the location of these sites in relation to existing healthcare and community facilities (SA Objectives 2 and 4).
- D.7.1.3 At the time of writing this report, the potential impact of the proposed development on Habitats sites, such as Ashdown Forest SAC and SPA, is uncertain, and therefore uncertain impacts on biodiversity within this designated area (SA Objective 8) could be expected from the development of the sites associated with this policy. The emerging HRA will provide analysis of the likely impacts, the identification of impact pathways and mitigation measures.
- D.7.1.4 The pre-mitigation assessments of the individual sites which contribute to this housing supply calculation have identified various potential constraints relating to their development, including: site end user exposure to surface water flooding; the use of large quantities of undeveloped land for construction; potential for adverse impacts on cultural heritage assets and landscape setting; increased traffic related GHG emissions and; increased energy usage. As such, potential major negative impacts have been identified for SA Objectives 6 and 8 and minor negative impacts have been identified for SA Objectives 5, 9, 10 and 11 for the housing provision stated within this policy. These findings are further outlined within **Appendix C**.

D.7.2 Policy DPH2: Sustainable Development – Outside the Built-Up Area

DPH2: Sustainable Development – Outside the Built-Up Area

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

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

The developer will need to satisfy the Council that:

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH2	+	0	0	+	0	-	0	+	0	0	0	0	+	+

- D.7.2.1 Policy DPH2 sets out the criteria for supporting small-scale development outside of existing built-up areas where it meets identified local housing, employment and community needs. This policy will help to ensure that development within countryside areas is “*demonstrated to be sustainable*” and adheres to various other policies within the Plan, such as design specifications.
- D.7.2.2 This policy will be likely to help meet the housing requirement of the whole community, and could lead to a range of type, tenure and mix of homes within the district. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community, as sites must either be within the Local Plan, a Neighbourhood Plan or proposals of fewer than 10 dwellings. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through ensuring that sites are “*contiguous with an existing built-up area of the settlement*”, it may enhance community cohesion, and therefore a minor positive impact on community and crime (SA Objective 4) would be expected.
- D.7.2.3 Through ensuring development proposed for locations outside of built-up areas are guided by Policy DPH2, a minor positive impact on landscape (SA Objective 8) could be expected as proposals for small developments and adherence to design guides which would conserve or enhance the landscape setting would be supported.
- D.7.2.4 By supporting localised developments outside of built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.
- D.7.2.5 Development outside of built-up areas would likely be located on previously undeveloped land. As such, development proposals under this policy (although of a smaller scale) could potentially result in the loss of soil, to some extent; therefore, a minor negative impact on natural resources could result (SA Objective 6).

D.7.3 Policy DPH3: Sustainable Development – Inside the Built-Up Area

DPH3: Sustainable Development – Inside the Built-Up Area

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

In areas with good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars, there may be an opportunity to deliver a greater concentration of development.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH3	+	0	0	+	0	+	0	+	0	+	0	0	+	+

D.7.3.1 Policy DPH3 sets out the criteria for supporting development within built-up areas where it which will help to provide appropriate development within existing towns and villages and adheres to various other policies within the Plan, such as design specifications.

D.7.3.2 This policy will be likely to contribute towards meeting the housing requirement of local communities, and could lead to a range of type, tenure and mix of homes within the district due to the requirement to ensure development is of an appropriate scale and nature depending on the settlement in question. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through supporting residential developments within the built-up areas, a greater sense of community cohesion could result, and it is likely that new development would be well located with respect to existing local services, and therefore a minor positive impact on the community and equality (SA Objective 4) would be expected.

D.7.3.3 Through ensuring development proposed for locations within built-up areas are guided by Policy DPB1 (Character and Design), a minor positive impact on landscape (SA Objective 8) could be expected as developments would be expected to adhere to design guides and would therefore likely conserve or enhance the landscape setting of the surroundings.

D.7.3.4 Policy DPH3 seeks to support a greater concentration of residential units within areas with “good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars”. Therefore, a minor positive impact on climate

change and transport (SA Objective 10) could be expected through potentially reducing the level of GHGs emitted from private cars and their subsequent impact on climate change.

D.7.3.5 By supporting localised developments within built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where construction of the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

D.7.3.6 Furthermore, through promoting development within existing settlements including infilling and redevelopment, Policy DPH3 could potentially help to encourage an efficient use of land and reduce the need to develop other greenfield locations. A minor positive impact on natural resources could therefore be expected (SA Objective 6).

D.7.4 Policy DPH4: General Principles for Housing Allocations

DPH4: General Principles for Housing Allocations

All housing allocations must be delivered in accordance with the development plan policies when read as a whole, and site-specific requirements set out in individual allocation policies:

- Significant Sites: DPSC1 – DPSC3
- Housing Allocations: DPH5 – DPH25

In addition, all Significant Sites and Housing Allocations must:

Urban design principles

- Design sites in accordance with the Design Guide SPD
- Design sites within the High Weald AONB in accordance with the **High Weald Housing Design Guide**.
- Provide a high degree of integration and connectivity between new and existing communities.
- Design new development at a density that is appropriate for the location.
- Make a positive contribution towards local character and distinctiveness.
- Create safe communities through appropriate design and layout that reduces the likelihood of crime and anti-social behaviour.

Landscape considerations

- Undertake Landscape and Visual Impact Assessment or Appraisal (LVIA) on any rural and edge of settlement sites. In the AONB the LVIA will utilise the AONB Management Plan components as landscape receptors. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements.
- Provide a Landscape Strategy to identify how natural features on site have been retained and incorporated into the landscape structure and design of the site and informed the landscaping proposals for the site.
- Submit Arboricultural Impact Assessment and Arboricultural Method Statements for all sites where development will be within 5 metres of any trees.

Historic environment and cultural heritage

DPH4: General Principles for Housing Allocations

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

Biodiversity and Green Infrastructure

- Carry out and submit habitat and species surveys at the earliest opportunity in order to inform the design and conserve important ecological assets from negative direct and indirect effects.
- Protect and enhance green infrastructure and corridors by ensuring built development avoids and integrates existing green infrastructure into the layout of the scheme, reinforcing and providing new connections to existing corridors to develop a connected network of multi-functional greenspace, including incorporating opportunities to contribute to strategic green infrastructure.
- Improve access to, and understanding of natural greenspace and nature conservation features, including recognising the importance and role of green infrastructure to the ecosystem, biodiversity, public rights of way, health and well-being, the water environment, community facilities and climate change. Green Infrastructure is to be incorporated with SuDS, where possible, to improve biodiversity and water quality.

Access and highways

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

Flood risk and drainage

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

Utilities

DPH4: General Principles for Housing Allocations

- Liaise with water, gas and electricity providers to ensure that appropriate works are carried out if needed.

Contaminated Land

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

Minerals Safeguarding

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

Aerodrome Safeguarding Requirements

- Ensure that proposed development on this site does not impact on the safe operation of Gatwick Airport. The following must be taken into consideration:
 - Impact of buildings & structures on navigational aids & instrument flight procedures
 - Schemes that contain large areas of landscaping, water bodies including SUDS schemes, buildings with large areas of flat/shallow pitched roofs and waste & recycling sites could attract birds in large numbers which could increase the bird strike risk to the airport
 - Large and/or coloured lighting schemes close to the airport
 - Wind turbines or large areas of solar panels

In addition, all Significant Site must:

- Deliver compact and connected places providing a range of services that meet most people's daily needs such as new/or improved community, retail, cultural, educational, health, recreation, play and other facilities to create services and places that help to form strong local communities and encourage healthy lifestyles, and/or are connected by safe, convenient, sustainable transport modes to existing services. Early delivery of sustainable transport networks and community facilities will be important to develop a sense of community and place from the early phases of the development;
- Deliver a landscape led approach to the master planning of the development, ensuring on site green infrastructure assets are protected and enhanced, and contributes to wider green infrastructure networks;
- Secure a minimum biodiversity net gain of 20% to be demonstrated through a Biodiversity Gain Plan which sets out how net gains for biodiversity will be achieved, secured and managed appropriately taking into account the Council's objectives and priorities for biodiversity net gain and nature recovery;
- Provide a suitable mix of housing including affordable housing, older persons accommodation, self-build plots;
- Provide permanent pitches for Gypsies and Travellers who travel to contribute towards the total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development;
- Provision of older person and specialist accommodation towards the additional total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development.

DPH4: General Principles for Housing Allocations

- Provide land for employment uses, unless it is demonstrated that there is not demand for employment land at that location;
- Submit an Employment and Skills Plan with the planning application to secure Improvements to the skills of local people and to enable them to take advantage of the resulting employment opportunities;
- Provide public transport, walking and cycling infrastructure to nearby settlements that provide higher order service and transport interchanges;
- Provide necessary transport improvements that take account of the wider impact of the development on the surrounding areas;
- Meet at least ‘Excellent’ in BREEAM Communities Technical Standards and must make reasonable endeavours to achieve an ‘Outstanding’ rating; and
- Meet a maximum water consumption standard of 85 litres per person per day (including external water use) to minimise the impact of the development on water resources and water quality. Rainwater harvesting and greywater recycling measures should be incorporated into the development as well as using water efficient fittings and appliances. Water neutral developments will be encouraged where this is possible.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH4	++	++	+	++	++	+	++	++	++	++	++	++	+	+

D.7.4.1 Policy DPH4 sets out the general principles for housing allocations and covers a wide range of topics for development proposals to adhere to in order to be supported by the Plan. The policy regards the following topics: urban design; landscape; historic environment and cultural heritage; biodiversity and GI; access and highways; flood risk and drainage; utilities; contaminated land; minerals safeguarding; and aerodrome safeguarding requirements, amongst further criteria for Significant Sites to meet.

D.7.4.2 This policy outlines requirements across a range of topics which would help to provide sustainable resolutions, through allocations of sites, to various issues faced by the district including providing the housing need for an ageing population, promoting healthy lifestyles and reducing fear of crime within the community. Additionally, the policy has a recurring theme of preparedness for the future, with climate change posing various threats regarding flood risk, water resources and human health, for example. The policy seeks to ensure new developments within Significant Sites reach ‘excellent’ BREEAM standards and meet water consumption targets. It is expected that through this policy and the context within, major positive impacts on the following topics could be expected: housing; health and wellbeing; community and crime; flooding; biodiversity; landscape; cultural heritage; climate change

and transport; energy and waste and water resources (SA Objectives 1, 2, 4, 5, 7, 8, 9, 10, 11 and 12).

D.7.4.3 The policy outlines various requirements for Significant Sites, including the requirement to provide new and/or improved educational facilities. Policy DPH4 also states that Significant Sites must provide access to sustainable infrastructure, such as public transport and active transport links, in addition to good connectivity between settlements within the Mid Sussex District. These developments must also “*submit an Employment and Skills Plan ... to secure Improvements to the skills of local people*”. Therefore, there will likely be benefits on education and the economy through improved access to employment opportunities, facilities and services located within centres throughout the district. A minor positive impact on education (SA Objective 3) and economic regeneration and growth (SA Objectives 13 and 14) could be expected.

D.7.4.4 This policy seeks to “*investigate any potential land contamination from present or historical on site or adjacent land uses*” and to ensure that any allocated development sites within Minerals Safeguarding Zones or a Consultation Areas consult with West Sussex County Council and also address requirements as set out within the West Sussex Joint Minerals Plan (2018), with likely benefits for the conservation of natural resources. A minor positive impact on natural resources could therefore be expected (SA Objective 6)

D.7.5 Policies DPH5 – DPH25

XXX: XXX														
XXX														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
XXX														

D.7.5.1 Please note: Site policy assessments TBC.

D.7.6 Policy DPH26: Older Persons Housing and Specialist Accommodation

DPH26: Older Persons Housing and Specialist Accommodation

Older Persons’ Housing Need

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

Table X: Older Persons’ housing need to 2038 (2021 SHMA)

Accommodation Type and Tenure		Need (units/ bedspaces)
Housing with Support (<i>retirement living or sheltered housing</i>)	Market	801
	Affordable	15
Housing with Care (<i>extra care</i>)	Market	857
	Affordable	214
Residential Care Bedspaces	n/a	300
Nursing Care Bedspaces	n/a	0 ⁹

Site Allocations

To ensure that a sufficient amount of older persons’ housing and specialist accommodation is delivered to meet identified needs, the Council makes provision for older persons’ accommodation as part of the following site allocations:

DPH5: Land at west of Burgess Hill

DPH6: Land at Ansty Farm, Ansty

DPH7: Land south of Reeds Lane, Sayers Common

DPH8: Land at Crabbet Park

DPH14: Land to west of Turners Hill Road, Crawley Down

The amount of land made available should be commensurate with the overall scale of development proposed at the significant sites.

In addition, two sites are allocated specifically for older persons’ specialist accommodation:

DPH31: Land at Byanda, Hassocks

DPH32: Land at Hyde Lodge, London Road, Handcross

The precise yield and accommodation type will be determined following further work site promoter/landowners and commensurate increases to overall yields and densities to reflect this type of accommodation as older persons accommodation can be provided at higher densities.

Allocations and proposals for older persons’ accommodation will be required to:

- i. provide affordable housing in line with Policy DPH32, where classified as C2 or C3; and
- ii. be in accordance with the identified need as shown in table X above.

⁹ The Council’s 2021 SHMA shows that there is currently an oversupply of 89 Nursing Care Bedspaces in the district, therefore provision should be focussed on other forms of older persons’ accommodation.

DPH26: Older Persons Housing and Specialist Accommodation

New developments

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

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

Extensions to Housing for Older People and Specialist Housing

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

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

Loss of Housing for Older People and Specialist Housing

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

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

Policy Reference	1 Housing	2 Health & Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change & Transport	11 Energy & Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
DPH26	+	+	0	+	0	0	0	+	0	+	0	0	0	0

D.7.6.1 Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will

require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. Policy DPH26 sets criteria for related development proposals and aims to provide adequate accommodation for older residents and those with specialist needs within Mid Sussex. Therefore, this policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 1).

D.7.6.2 By providing specialist and supported homes for older residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, result in a minor positive impact on health and wellbeing and communities (SA Objectives 2 and 4).

D.7.6.3 Additionally, Policy DPH26 seeks to ensure that new development proposals for older persons' housing is "*accessible by foot or public transport to local shops, services community facilities and the wider public network*". This would help ensure that vulnerable residents would not be cut off from these essential services and will also help to ensure that residents have opportunities choose to use sustainable transport instead of personal-use vehicles, potentially resulting in the reduction of transport related GHG emissions. A minor positive impact on climate change and transport could therefore be expected (SA Objective 10).

D.7.6.4 This policy states that outside of the built-up area boundaries, development for older persons' housing and specialist accommodation should ensure that the "*scale of the development respects the setting, form and character of the settlement and surrounding landscape*". Additionally, development proposals for annexes to older persons' housing and special accommodation should respect "*the character and appearance of the host building and local area and is sub-servient to the existing building*". Through supporting proposals which respect the setting of the local landscape, a minor positive impact could be expected (SA Objective 8).

D.7.7 Policies DPH27 – DPH28

XXX: XXX

XXX

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
XXX														

D.7.7.1 Please note: Site policy assessments TBC.

D.7.8 Policy DPH29: Gypsies, Travellers and Travelling Showpeople

DPH29: Gypsies, Travellers and Travelling Showpeople

The Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2021) identifies a need for 4 net permanent pitches for Gypsies and Travellers who still travel¹⁰ and 12 net permanent pitches for Gypsies and Travellers who no longer travel¹¹, for the period 2021 to 2038. Part of the 16-pitch need will be met by the delivery of existing commitments¹², as shown in the table X below.

Table X: Gypsy and Traveller Provision

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

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

¹⁰ For Gypsies, Travellers and Travelling Showpeople who meet, or considered may meet, the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

¹¹ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

¹² Commitments here are defined as allocations within the District Plan, Neighbourhood Plans and planning permissions.

DPH29: Gypsies, Travellers and Travelling Showpeople

New and extensions to Gypsy, Traveller and Travelling Showpeople sites

In guiding the allocation of Gypsy, Traveller and Travelling Showpeople sites¹³ (permanent and transit) and considering planning applications, proposals will be supported provided that:

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

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

Existing Gypsy, Traveller and Travelling Showpeople sites

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

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

¹³ For Gypsies and Travellers who meet and do not meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel

DPH29: Gypsies, Travellers and Travelling Showpeople

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

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH29	+	+	0	+	0	0	0	0	0	0	0	0	0	0

- D.7.8.1 In accordance with the Planning policy for traveller sites¹⁴, Gypsies and Travellers are defined as *“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.
- D.7.8.2 Travelling Showpeople are defined as *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”*¹⁵
- D.7.8.3 This policy would be expected to meet the identified pitch targets for Travellers and Travelling Showpeople which address the likely permanent and transit accommodation needs, and as such, have a minor positive impact on housing (SA Objective 1).
- D.7.8.4 This policy requires all proposed Gypsy and Traveller sites to meet various criteria including provisions for safe access and within reasonable distance to schools and other facilities. Additionally, development of these sites must be *“appropriately located and designed to/ or capable of being designed to ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the Travellers”*. Therefore, minor positive impacts on site end users’ health and wellbeing and access to community facilities would be expected from this policy (SA Objectives 2 and 4).
- D.7.8.5 Policy DPH29 seeks to ensure developments of Gypsy and Traveller sites minimise impacts on landscape settings, including the High Weald AONB as per Policy DPC4, and also requires

¹⁴ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date Accessed: 20/01/22]

¹⁵ Ibid

the proposals to ensure that “Any site within the 7km zone of influence around Ashdown Forest will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required” as per Policy DPC6. Although this policy seeks to mitigate and minimise potential impacts on biodiversity and landscape assets, such as Ashdown Forest SPA and SAC and High Weald AONB, negligible impacts on receptors associated with these themes within the Plan area would be expected (SA Objectives 7 and 8) where the criteria set out within the policy would likely neither wholly protect nor enhance these assets.

D.7.9 Policy DPH30: Self and Custom Build Housing

DPH30: Self and Custom Build Housing

The District Council believes that self- and custom-build housing has an important role to play in increasing housing choice in the district, consequently:

- i. Proposals for self- or custom-build housing developments will be supported on suitable sites and subject to compliance with other relevant policies within the District Plan.
- ii. Provision of serviced plots for self- or custom-build housing will be encouraged on all suitable sites, subject to the level of demand for such housing and viability.
- iii. A minimum of 5% of the residential plots on housing sites comprising of 100 or more dwellings, subject to feasibility and viability, will need to be provided as serviced plots for self- or custom-build housing.
- iv. Serviced plots will need to have a water, foul and surface water drainage, telecommunications and a gas (where available) and electricity supply available at the plot boundary and legal access to a public highway.
- v. Affordable housing on self or custom build sites will need to be provided through serviced land being made available at nil cost or through individual serviced plots being transferred at nil cost.
- vi. A design code, prepared by the developers and agreed with the District Council, will need to be followed for each site and individual plot passports will also be required.
- vii. Each self- or custom-build plot will need to form a separate phase of the development in order to facilitate the timely submission of a reserved matters planning application by the intended occupant of each plot.
- viii. Communities preparing Neighbourhood Plans will be encouraged to identify suitable sites for self- and custom-build housing plots within their neighbourhood plan area.

The above policy will be monitored and kept under review, having regard to any changes to evidence of demand.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH30	+	0	0	0	0	0	0	+	0	0	0	0	0	0

D.7.9.1 This policy seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a proportion of residential sites of 100 or more units to be available for self-build housing.

D.7.9.2 This policy would be likely to have a positive impact by ensuring that new housing delivered across the Plan area can accommodate the diverse requirements of residents within Mid Sussex, and therefore, have a minor positive impact on housing (SA Objective 1).

D.7.9.3 By encouraging the development of self and custom build housing, in accordance with local design guides, this policy could help to increase the diversity of buildings within neighbourhoods and provide visual interest. This could potentially result in a minor positive impact on the character of the local landscape and townscape (SA Objective 8).

D.7.10 Policy DPH31: Housing Mix

DPH31: Housing Mix

To support the delivery of sustainable, mixed and balanced communities, housing development will:

- 1) provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs. The Council expects the ranges set out in the below table to be used as a starting point;

Table X: Housing Mix split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Market housing	5-10%	20-25%	40-45%	25-30%
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- 2) Variations to the above will be considered where the Council is satisfied that:

DPH31: Housing Mix

- i. The site characteristics and location dictate that there is a more appropriate mix of sized of dwellings;
- ii. There is an identified need for a particular size of dwelling in the nearest settlement; and/ or
- iii. There are demonstrable financial viability reasons for doing so.

Other accommodation types

To meet the identified current and future the needs of different groups in the community, the Council will seek a range of accommodation types to be delivered on new developments which are of an appropriate size, scale and location.

The types of accommodation include that which is suitable for:

- Older persons (DPH26);
- People with disabilities (DPH36);
- Self-build and custom housebuilding (DPH30);
- Build to Rent;
- Co-Living; and
- Gypsy and traveller community (DPH29).

Where applicable, specific policies on the different accommodation types are identified against each of the above.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH31	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.7.10.1 An appropriate mix of housing is required across the Plan area to help ensure that the varied needs of current and future residents are met. This in particular may include an increased number of smaller homes and affordable homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

D.7.10.2 Policy DPH31 seeks to “provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs”, including the provision of specialist accommodation for those with particular needs, as well as accommodation for Gypsy and Traveller communities. This would be likely to have a minor positive impact on local housing provision (SA Objective 1). By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, as well as contribute to a vibrant and varied community, and as such a minor

positive impact on health and wellbeing and community is expected (SA Objectives 2 and 4).

D.7.11 Policy DPH32: Affordable Housing

DPH32: Affordable Housing

Delivering the amount and type of housing which meets the needs of all sectors of the community is a key objective of the District Plan. Consequently, the Council requires:

- I. a minimum of 30% on-site affordable housing, with the number of units rounded up to the next whole number, on all residential and mixed-use developments providing 10 dwellings or more, or with a maximum combined gross floorspace of greater than 1,000m²;
- II. the full 30% affordable housing requirement to be provided on each and every phase of a phased development, and for the affordable housing to be fully integrated within the development;
- III. developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 10 dwellings, but with a maximum combined gross floorspace of less than 1,000m², to provide a commuted payment towards off-site provision equivalent to providing 30% on-site affordable housing;
- IV. in the case of redevelopment, at least the same number of affordable homes to be re-provided in accordance with current mix and tenure requirements, on sites where the most recent use has been for affordable housing;
- V. a mix of affordable housing tenure comprising 25% intermediate homes/ First Homes and 75% social or affordable rented, unless the best available evidence supports a different mix;
- VI. Unless otherwise agreed with the Council the tenure, type and size split on each site is to be:

Table X: Affordable housing split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- VII. A minimum 12% of affordable housing units (rounded up to the next whole number) on all schemes to be Wheelchair Accessible dwellings, unless agreed otherwise with the Council's Housing Enabling Officer;
- VIII. fully serviced land to be provided for the construction of the requisite number of affordable homes at nil cost, and for the affordable properties to be transferred to a Registered Provider at a price which reflects a nil land value and nil public subsidy;

DPH32: Affordable Housing

- IX. affordable housing units to meet national minimum space standards, or any other increased standard which supersedes these, since the units are likely to be fully occupied;
- X. all affordable housing units to be fully integrated into the scheme layout, and provided in clusters of no more than 10 units with open market units in between each cluster, (a couple of extra units may be allowed in clusters which include flats), in order to create more balanced communities;
- XI. affordable housing units to be ‘tenure blind’ so that affordable and private homes are indistinguishable from one another, in terms of design, build quality, appearance, materials and site location.

Proposals which do not provide a minimum of 30% affordable housing will be refused, unless clear evidence demonstrates, to the Council’s satisfaction, that the site cannot viably support the required number of affordable housing units. The Council’s approach to the assessment of financial viability is set out in its viability policy (see Appendix X), but it should be noted that the submitted viability appraisal must be based on a policy compliant scheme. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer’s cost. A viability review will also be required later in the project, for all schemes which are not policy compliant. At the review stage more accurate information about build costs and sales values, will be able to be provided for assessment.

Financial contributions, in place of on-site affordable housing, will only be agreed where there are exceptional reasons preventing the provision of on-site affordable housing. These include where:

- there are prohibitively high service charges;
- schemes comprise less than 6 units;
- the development comprises a single block retirement scheme; or
- the Council wishes to use such funding to develop its own housing.

In such cases a financial contribution payable prior to works commencing and reflecting the full cost of providing alternative serviced land for the required number of units (rounded up if the resultant number is not a whole number), will be sought. The amount per unit will depend on the size, location and type of affordable housing required to be provided by the scheme. The contribution will be sought through an appropriate planning obligation.

Development proposals will be expected to make efficient use of land, and any proposal which appears to have an artificially low density, in order to avoid the required thresholds for affordable housing, may be refused planning permission. The same will also apply to any site which appears to have been deliberately sub-divided, as a possible measure to avoid the required affordable housing threshold.

The above policy will be monitored and kept under review, having regard to the Council’s Housing Strategy and any changes to evidence of housing needs.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
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Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH32	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.7.11.1 Policy DPH32 seeks to ensure that, throughout the Plan area, the MSDPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents, whereby “proposals which do not provide a minimum of 30% affordable housing will be refused” unless there is clear evidence that the requirement is wholly unachievable.

D.7.11.2 This policy sets out the requirements for provision of affordable housing, including those which are wheelchair accessible, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, the policy would be expected to have a minor positive impact on housing provision (SA Objective 1). Through meeting the identified need of affordable housing, Policy DPH32 will enable residents to purchase more affordable homes within their means potentially resulting in positive impacts on financial wellbeing, with subsequent minor positive health impacts (SA Objective 2).

D.7.11.3 In seeking to integrate affordable housing into new development, the policy also has the potential to create more inclusive communities by meeting the needs of local people; therefore, a minor positive impact on SA Objective 4 could be expected.

D.7.12 Policy DPH33: First Homes

DPH37: First Homes

First Homes are part of the Government’s policy to promote home ownership and can be delivered through developer contributions and First Homes Exception sites.

First Homes will be supported by the District Council as part of the 30% affordable housing requirement (DPH33), subject to compliance with other relevant policies within the development plan and the following criteria:

- i. The dwellings are discounted by a minimum of 30% against the market value;
- ii. After the discount has been applied, the first sale of the home is priced no higher than £250,000;
- iii. The purchaser meets the First Homes eligibility criteria; and
- iv. The local connection test criteria are met by the purchaser.

First Homes Exception Sites

The District Council will support First Homes Exception Sites provided that the following additional criteria are met:

- v. The proposals are wholly or primarily for First Homes;

DPH37: First Homes

- vi. There is an identified local need for First Homes which is not already being met elsewhere in the district;
- vii. The development is located adjacent to an existing settlement containing key local services;
- viii. The proposal is proportionate in size and scale to the existing settlement and respects its setting; and
- ix. The site is not located within a designated rural area¹⁶.

All affordable homes delivered as First Homes in the above circumstances will be secured through a S106 agreement to ensure that the discount, relevant eligibility and local connection criteria remain in perpetuity.

Neighbourhood Plans may apply their own First Homes eligibility criteria, an increased minimum discount and lower price and income caps in line with national guidance. Alterations to the criteria or requirements must however be evidence based and not impede the delivery of homes.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH33	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.7.12.1 Policy DPH33 seeks to ensure that First Homes are provided as part of the overall residential mix, type and tenure of houses delivered within the Plan period. First Homes, as set out by the policy, will make up part of the 30% affordable housing requirement as set within Policy DPH32.

D.7.12.2 This policy sets out the requirements for the development of First Homes and First Home Exception Sites which would be supported by the Council, and therefore by meeting the identified need for first time buyers within the Plan area, a minor positive impact on housing is expected (SA Objective 1). Through meeting the identified need of First Homes, Policy DPH33 will enable residents to purchase more affordable homes within a community of their choice potentially resulting in positive impacts on financial wellbeing and subsequent positive health impacts, as well as helping to create more vibrant and inclusive local communities. A minor positive impact on health and wellbeing and community and equality could therefore be expected (SA Objectives 2 and 4).

¹⁶ National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985 (Annex 2, NPPF)

D.7.13 Policy DPH34: Rural Exception Sites

DPH34: Rural Exception Sites

The development of rural exception sites for affordable housing will be permitted provided that:

- i. the development comprises 100% affordable housing;
- ii. the housing is to meet the needs of current or recent residents of the Parish or those with a current employment or close family connection;
- iii. The size of properties is justified by a Parish Housing Needs Survey carried out in the last 5 years;
- iv. The occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing;
- v. The scale of the development respects the setting, form and character of the settlement and surrounding landscape; and
- vi. The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school.

Where it can be clearly demonstrated through evidence that, from a viability perspective, the site cannot support a scheme comprising 100% affordable housing, the District Council will consider an element of open market and/ or self and custom- build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme, provided that:

- The requirements of ii), iii), v) and vi) can be met for the overall scheme and for the affordable housing element i) and iv) can be met; and
- The new development physically integrates the open market and affordable housing, which should seek to be ‘tenure blind’ and makes best use of the land.

Details of the evidence required to justify an element of open market and/ or self-build housing is set out in the Council’s Viability Policy (see Appendix X).

The delivery of rural exception sites will normally be led by Parish Councils, through planning applications, Community Right to Build schemes, Neighbourhood Development Orders or through Neighbourhood Plans.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH34	+	0	+	0	0	-	0	+	0	+	0	0	0	0

- D.7.13.1 Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing¹⁷. Paragraph 78 of the NPPF¹⁸ states that *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this”*.
- D.7.13.2 This policy would be expected to help meet the housing requirements and increase the provision of affordable housing across the Plan area. Therefore, a minor positive impact on housing would be expected (SA Objective 1).
- D.7.13.3 Through Policy DPH34, the development of rural exception sites for affordable housing will only be permitted if certain criteria are met including *“The scale of the development respects the setting, form and character of the settlement and surrounding landscape”* and *“The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school”*. Therefore, through ensuring landscape settings and accessibility to public transport and local services (potentially including primary schools) are considered, minor positive impacts on education, landscape and climate change and transport could be expected (SA Objectives 3, 8 and 10).
- D.7.13.4 Rural exception sites could potentially be located on previously undeveloped land in the open countryside. As such, development proposals (although of a smaller scale) would be likely to result in the loss of soil resources, and therefore, have a minor negative impact on natural resources (SA Objective 6).

D.7.14 Policy DPH35: Dwelling Space Standards

DPH35: Dwelling Space Standards

Minimum nationally described space standards see Glossary (Appendix X), for internal floor space and storage space will be applied to all new residential development.

These standards are applicable to:

- Open market dwellings and affordable housing;
- The full range of dwelling types; and
- Dwellings created through subdivision or conversion.

¹⁷ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 20/01/22]

¹⁸ Ibid

DPH35: Dwelling Space Standards

All dwellings will be required to meet these standards, or subsequent equivalent standards, other than in exceptional circumstances where clear evidence will need to be provided to show that the internal form or special features prevent some of the requirements being met.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH35	0	+	0	0	0	0	0	0	0	0	0	0	0	0

D.7.14.1 The Nationally Described Space Standards¹⁹ help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still provide new residents with enough internal space. In general, it is expected that the greater the internal space within a property, the better the standard of living for residents.

D.7.14.2 An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. As such, a minor positive impact on health and wellbeing is expected from this policy (SA Objective 2).

D.7.15 Policy DPH36: Accessibility

DPH36: Accessibility

All development will be required to meet and maintain high standards of accessibility so that all users can use them safely and easily.

This will apply to all development, including changes of use, refurbishments and extensions, open spaces, the public realm and transport infrastructure, and will be demonstrated by the applicant.

With regard to listed buildings, meeting standards of accessibility should ensure that the impact on the integrity of the building is minimised.

Accessible and Adaptable Dwellings

All residential developments will be expected to meet Category 2 – accessible and adaptable dwellings under Building Regulations – Approved Document M Requirement M4(2), with the following exceptions:

- i. Where new dwellings are created by a change of use;
- ii. Where the scheme is for flatted residential buildings of fewer than 10 dwellings;

¹⁹ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard> [Date Accessed: 21/01/22]

DPH36: Accessibility

- iii. Where specific factors such as site topography make such standards unachievable by practicable and/ or viable means;
- iv. Where a scheme is being proposed which is specifically intended for the needs of particular individuals or groups, where a greater proportion may be appropriate.

Wheelchair-user dwellings

- Category 3 – Wheelchair-user dwellings under Building Regulations – Approved Document M Requirement M4(3)(a) will be required for a minimum of 5% of market homes, dependent on the suitability of the site and the need at the time.
- Where affordable housing is required, a minimum of 12% of the affordable housing will be required to be M4(3)(a) or, where the Council is responsible for allocating or nominating a person to live in that dwelling, M4(3)(b).

The Requirement will also apply to private extra care, assisted living or other such schemes designed for frailer older people or others with disabilities and those in need of care or support services.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH36	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.7.15.1 Mid Sussex is an area with an increasingly high population of older people, with approximately 21% of the population aged 65 or over in 2020²⁰. As such, future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs.

D.7.15.2 Policy DPH36 would be likely to help ensure residential developments allow for the safe and convenient access for a variety of residents, including older people and wheelchair users. Therefore, this policy would be likely to have a minor positive impact on housing, through meeting requirements of the whole population including older people, and residents’ health and wellbeing through such provisions (SA Objectives 1 and 2).

²⁰ ONS (2020) Mid Year Population Estimates June 2020. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesandnorthernireland> [Date Accessed: 21/01/22]

D.8 Sustainable Communities

D.8.1 Policies DPSC1-DPSC3

XXX: XXX

XXX

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
XXX														

D.8.1.1 **Please note:** Site policy assessments TBC.

DRAFT

D.9 Infrastructure

D.9.1 Policy DPI1: Securing Infrastructure

DPI1: Securing Infrastructure

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure and/or mitigation measures to meet the additional need arising from the proposal. Both on-site and off-site provision, including beyond the district boundary, may be required to address the impacts of development, including cumulative effects on the existing infrastructure.

Existing infrastructure services and facilities will be protected where they contribute to the needs of local communities, unless an equivalent replacement or improvement is provided or there is sufficient alternative provision of the same type in the area, and subject to requirements set out elsewhere in the Plan.

Infrastructure should be provided at the appropriate time, prior to the development becoming operational or being occupied. Applicants will be expected to have early engagement with infrastructure providers to ensure any necessary works can be undertaken in a timely manner. Larger developments may need to be phased to ensure that this requirement can be met.

Where a proposal would be made unviable in light of the infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided for considerations. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. The Council's approach to the assessment of financial viability is set out in its viability policy (see Appendix X).

The design and layout of a development should ensure future access to utility infrastructure for maintenance and upgrading.

Proposals by service providers for the delivery of utility infrastructure required to meet the needs generated by new development in the District and by existing communities will be encouraged and permitted, subject to accordance with other policies within the Plan.

Infrastructure will need to be planned and delivered to ensure its future resilience against the impacts of climate change.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI1	0	+	+	+	+	0	0	+	0	+	+	+	+	+

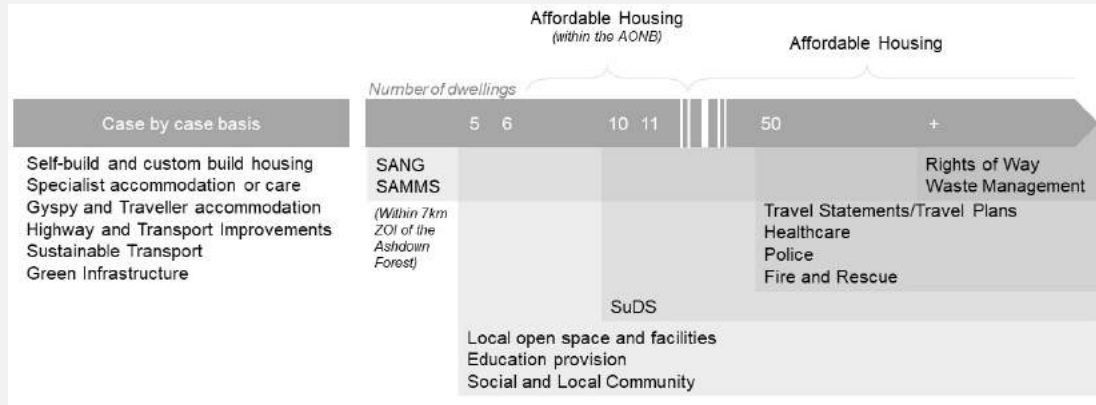
- D.9.1.1 Policy DPI1 aims to ensure that the Plan provides appropriate and proportionate infrastructure to deliver and support the proposed development, including schools and health facilities. This policy would be likely to help ensure that there are adequate services for all new residents in the area and could potentially improve the type and range of services available to current and future residents.
- D.9.1.2 This policy supports development proposals which would provide the infrastructure required to serve current and future residents, including utilities. Therefore, a minor positive impact on transport, energy and water resources could be expected in relation to potential improvements on public transport, energy efficient technologies and water supply and treatment infrastructure within the Plan area (SA Objectives 10, 11 and 12).
- D.9.1.3 The delivery of services and facilities to support new communities may include health care services, leisure facilities (such as improvements to sports facilities), schools and delivery/maintenance of GI associated with new developments, which may include the provision of publicly accessible open spaces, and enhancements to public rights of way. The policy has the potential to have a minor positive impact on landscape and townscape (SA Objective 8), access to education (SA Objective 3) as well as the health and wellbeing of new communities (SA Objectives 2 and 4).
- D.9.1.4 Furthermore, the policy could result in infrastructure improvements associated with the transport network and would support economic activity and encourage inward investment in the Plan area. The policy has the potential to have a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14).
- D.9.1.5 The infrastructure improvements could also help to ensure the maintenance of existing flood defences. There is the potential for a minor positive impact on climate change adaptation and resilience to flood risk (SA Objective 5).

D.9.2 Policy DPI2: Planning Obligations

DPI2: Planning Obligations

Where required, the Council will use planning obligations to address the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended). This may include but is not limited to the planning obligations set out in Figure XX.

Figure X Indicative planning obligations



Other planning obligations may be sought to secure policy requirements set out in this plan and to mitigate the specific impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended).

Appendix XX sets out the infrastructure quantity and accessibility standards and formulae used to calculate contributions. The infrastructure standards may be reviewed and will be set following assessments of need and viability. Contributions will be subject to inflation reviews to ensure the necessary infrastructure can be delivered.

Where a planning obligation (which may also be known as a Section 106 Agreement or Unilateral Undertaking) is entered into, the Council will secure fees associated with the monitoring of any planning obligations in addition to the Council’s legal costs in drafting and completing the agreement. The current applicable fees to be levied will be shown on the Council’s website.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI2	0	+	+	+	+	0	+	+	0	+	+	0	0	0

D.9.2.1 Policy DPI2 sets out the use of planning obligations in relation to addressing “the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010”. The Community Infrastructure Levy is an important tool for local authorities to use to help them deliver the infrastructure required to support further development within the area, and this policy provides supplementary information to these

provisions on a case-by-case basis and thresholds relating to the proposed dwelling numbers.

- D.9.2.2 The planning obligations, as outlined within the policy's flow diagram figure, relate to the different types of provisions required over certain dwelling thresholds. These concern sustainability topics such as health and wellbeing, education, social and community facilities, flood management, biodiversity (for example the Ashdown Forest Zone of Influence), public rights of way management, transport and energy. The policy could help to ensure that site end users are served by suitable infrastructure and are located in areas with good access to these services and facilities. Therefore, minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 4, 5, 7, 8, 10 and 11).

D.9.3 Policy DPI3: Major Infrastructure Projects

DPI3: Major Infrastructure Projects

In responding to major infrastructure proposals as a consultee or decision maker the Council will consider applications against the relevant national planning policy and the strategy and relevant policies of the development plan. The objective from the Council's perspective is that such proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan. However, the Council will seek to adopt an approach which is consistent with relevant NPS and take into account operational requirements of the MIP.

For a NSIP the Council will take into account through the preparation of a Local Impact report, how proposals through their formulation and implementation, avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible. Where the Council is the decision maker, these matters will be taken into account through the planning application process. In all cases the Council will also assess where appropriate how the consideration of alternatives has informed the proposals.

The Council will consider the benefits and impacts of a proposal having regard to direct, indirect secondary and cumulative benefits and impacts, and benefits and impact interactions. This assessment will include the construction, operation and decommissioning (including restoration) stages of the project. It will also have regard to reasonably foreseeable development proposals in the local area, including other infrastructure projects and employment and residential development.

Depending upon the scale and nature of the proposals, in order to present sufficient information for the Council to undertake the assessment, it may request the preparation of delivery plans identifying measures to be taken to maximise benefits, to avoid and minimise impacts, and to mitigate and compensate for impacts, with respect to matters such as the economy, climate change, the environment, transport and movement, housing, local communities (including safety, health, leisure and general well-being) council services, and education where this is justified by reference to national policy. The management or delivery plans should identify the systems and resources that will be used to implement the proposed measures.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI3	0	+	+	0	+	0	0	0	0	+	+	0	+	+

D.9.3.1 Policy DPI3 sets out the Council’s approach to considering major infrastructure projects and sets out requirements for developers with respect to preparation of various documents to support details surrounding the major infrastructure project including Local Impact reports. The policy states that *“proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan”* and should ensure that they *“avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible”*.

D.9.3.2 Through ensuring large infrastructure projects contribute positively to the district’s spatial strategy, minor positive impacts on economic regeneration and growth (SA Objectives 13 and 14) within the district could result where improved infrastructure (for example roads and public transport) could promote better access to shops, services and other businesses. Additionally, large infrastructure projects could provide local residents with employment, further positively impacting the economy.

D.9.3.3 Policy DPI3 seeks to provide further guidance for large infrastructure projects to adhere to. Large infrastructure projects, once complete, could provide various benefits to the Plan area including residents’ health and wellbeing (for example hospital provision), education, flood risk management, public transport and energy efficiency and waste treatment (for example potential improvements to energy production and waste processing infrastructure) and therefore minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 5, 10 and 11).

D.9.3.4 The remaining topics covered within the SA Objectives are assessed as negligible for impacts from this policy where it aims to ensure major infrastructure projects *“avoid and minimise impacts, and to mitigate and compensate for impacts”*. Any future major infrastructure projects will be assessed for their sustainability performance in relation to these topics, and others, on a case-by-case basis through various legal procedures including those outlined within Policy DPI3.

D.9.4 Policy DPI4: Communications Infrastructure

DPI4: Communications Infrastructure

The Council will encourage the incorporation of high quality digital infrastructure including fibre to new housing, employment and retail developments.

The expansion of the electronic communications network and digital infrastructure to the towns and rural areas of the District will be supported.

When considering proposals for new telecommunications equipment the following criteria will be taken into account:

- The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. On buildings, apparatus and associated structures should be located and designed in order to seek to minimise impact to the external appearance of the host building;
- New telecommunications equipment should not have an unacceptable effect on sensitive areas, including areas of ecological interest, areas of landscape importance, Areas of Outstanding Natural Beauty, the South Downs National Park, archaeological sites, conservation areas or buildings of architectural or historic interest and should be sensitively designed and sited to avoid damage to the local landscape character;
- Preference will be for use to be made of existing sites rather than the provision of new sites.

When considering applications for telecommunications development, regard will be given to the operational requirements of telecommunications networks and the technical limitations of the technology.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI4	0	0	0	0	0	+	0	0	0	+	0	0	+	+

D.9.4.1 Policy DPI4 supports the provision of high-quality digital infrastructure, such as superfast broadband, and electronic communications throughout the Plan area, in order to meet the needs of the current and future population.

D.9.4.2 With improvements to broadband and electronic communications in the area under this policy, residents would be likely to have greater access to essential services from home. This would provide increased opportunities to work from home and access a wider range of employment opportunities, resulting in a minor positive impact on economic growth (SA Objective 14). Through increasing the range of employment opportunities available within the district, this policy could also result in a minor positive impact on economic regeneration (SA Objective 13).

- D.9.4.3 Additionally, with improved access to online facilities and home working, this policy could potentially help to reduce the need to travel and reliance on personal car use such as for commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change and transport, due to reduced emissions associated with less traffic, and transport (SA Objective 10).
- D.9.4.4 Through preferring that communications infrastructure proposals “*use to be made of existing sites rather than the provision of new sites*” there may potentially be less undeveloped land and associated soil resources used for development, leading to minor positive impacts on natural resources (SA Objective 6).

D.9.5 Policy DPI5: Open Space, Sport and Recreational Facilities

DPI5: Open Space, Sport and Recreational Facilities

Development that provides new and/or enhanced open space, leisure, sport and recreational facilities, including allotments, to support healthy lifestyles and in accordance with the strategic aims of the Playing Pitch Study, Play & Amenity Green Space Study and Community Buildings Study (or as the studies are updated) will be supported.

The provision of new open space, leisure, sport and recreational facilities, including the provision of public open space, play areas and equipment, will be required for all new residential developments in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. On-site provision will be required where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities. The design of open space and public realm should accord with the Design Guide SPD.

Sites for appropriate open space, leisure, sport and recreational facilities to meet local needs will be identified through Neighbourhood Plans or a Development Plan Document produced by the District Council.

Proposals that involve the loss of open space, leisure, sports and recreational buildings and land, including playing fields, will not be supported unless:

- an assessment has been undertaken which has clearly shown the open space, leisure, sports or recreational land or building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Whilst a site may be surplus to requirements for open space, leisure, sport and recreation use, it may still be of environmental, social or cultural value. The site's development may have unacceptable visual or amenity impact, or adversely affect its wider healthy lifestyles, green infrastructure or biodiversity functions, including for climate change mitigation and resilience. Applicants will therefore need to carefully consider such as proposal alongside other policies in this Plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI5	0	+	0	+	0	0	+	+	0	0	0	0	0	0

D.9.5.1 This policy would be likely to help ensure residents have good access to open space, sport and recreational facilities, including play facilities for children and sports pitches. This would be expected to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health would be expected (SA Objective 2).

D.9.5.2 Policy DPI5 seeks to increase the provision of green spaces and recreational facilities, helping to ensure residents have access to a diverse range of natural spaces and habitats. The provision of green spaces can help create attractive places to live and strengthen a sense of place for local communities and help contribute to a sense of community and social cohesion. By supporting the provision of green space across the Plan area, this policy would be expected to have a minor positive impact regarding community cohesion (SA Objective 4), as well as enhancing the multi-functional benefits of GI including in terms of biodiversity and landscape (SA Objectives 7 and 8).

D.9.6 Policy DPI6: Community and Cultural Facilities and Local Services

DPI6: Community and Cultural Facilities and Local Services

The provision or improvement of community and cultural facilities and local services that contribute to creating sustainable communities will be supported where the proposal is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside and where:

- The need for the community or cultural facility or local service is clearly demonstrated;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- The design and layout of the proposals, including ancillary facilities, area sensitive to the existing character and setting;
- It does not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

Proposals that involve the loss of a community or cultural facility (including those facilities and services where the loss would reduce the community’s ability to meet its day-to-day needs locally), will not be supported unless:

DPI6: Community and Cultural Facilities and Local Services

- an assessment has been undertaken which has clearly shown the community or cultural facility or local service to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or
- the development is for alternative community and cultural provision, the benefits of which clearly outweigh the loss of the current or former use.

New residential development will be required to contribute to the provision of new or enhanced community facilities in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. The on-site provision of new community facilities will be required on larger developments, where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities.

Policy Reference	1 Housing	2 Health & Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change & Transport	11 Energy & Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
DPI6	0	+	0	+	0	0	0	0	0	0	0	0	0	+

D.9.6.1 Policy DPI6 seeks to protect existing community facilities and support development proposals for new or improved facilities. This policy would be expected to ensure that existing local facilities are retained and enhanced, which would be likely to improve local residents’ access to services such as health facilities, sports facilities and schools.

D.9.6.2 By encouraging the retention or provision of these community facilities, this policy would be expected to have a minor positive impact in regard to health, access to community facilities and supporting local businesses, potentially leading to economic growth (SA Objectives 2, 3, 4 and 14).

Appendix E: Reasonable Alternative Site Post-Mitigation Assessments

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E.1 Introduction

E.1.1 Preface

E.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through for example, emergent District Plan Review (DPR) policies.

E.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as District Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.

E.1.1.3 The post-mitigation assessment considers how Local Plan policy would help to avoid or reduce the impacts that were identified at the pre-mitigation stage.

E.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred options in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.

E.1.1.5 **Chapter E.2** summarises the pre-mitigation impacts of the 42 reasonable alternative sites considered throughout this stage of the SA process, **Chapter E.3** provides detail on the mitigation within the Mid Sussex DPR and **Chapter E.4** summarises the post-mitigation impacts of the 42 sites.

E.1.1.6 **Chapter E.5** presents a series of recommendations Lepus has provided to the Council, highlighting ways in which to improve or enhance the Mid Sussex DPR policies, which may further mitigate identified potential adverse impacts, and the Council's responses to these recommendations.

E.2 Pre-Mitigation Assessment

E.2.1 Overview

E.2.1.1 A total of 42 reasonable alternative sites have been assessed in the SA. These assessments are presented in **Appendix C** of the Regulation 18 SA Report. **Table E.2.1** re-presents the pre-mitigation impact matrix for all 42 reasonable alternative sites considered throughout the preparation of the Mid Sussex DPR.

Table E.2.1: Pre-mitigation impact matrix for all reasonable alternative sites

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
13	+	-	-	++	-	-	0	-	-	-	-	0	++	+
18	++	-	--	-	--	--	--	-	-	-	--	-	-	++
19	+	-	--	-	--	-	0	-	-	-	-	0	-	+
198	+	-	-	-	+	-	-	--	0	-	-	-	-	+
210	+	-	++	+	+	-	0	-	0	-	-	0	+	+
503	++	-	--	-	-	--	--	-	-	-	--	0	-	-
508	+	-	--	-	-	-	0	-	0	-	-	0	-	+
526	+	-	-	-	+	-	0	-	-	-	-	0	-	+
543	+	-	-	-	+	-	0	-	0	-	-	0	-	+
556	+	-	-	-	--	-	-	-	-	-	-	-	-	+
573	+	-	++	-	+	-	0	-	0	-	-	0	-	+
575	++	-	--	-	--	--	--	-	-	-	--	-	-	+
601	++	-	--	-	--	-	--	-	-	-	--	0	-	+
617	++	-	-	-	-	-	0	-	-	-	--	0	-	+
631	+	-	--	-	+	-	0	-	0	-	-	0	-	+
678	++	-	--	-	--	--	--	-	-	-	--	-	-	+
686	++	-	-	-	--	-	-	-	-	-	--	0	-	+
688	++	-	-	-	--	-	--	-	-	-	--	-	-	+
736	++	-	--	-	--	--	--	-	-	-	--	-	-	++
740	++	-	0	-	--	--	--	-	0	-	--	-	-	++
743	+	-	-	-	--	-	-	-	0	-	-	0	-	-
784	+	-	--	-	+	-	0	-	0	-	-	0	-	+
789	+	-	-	-	+	-	0	-	-	-	-	0	-	+
799	++	-	-	-	--	--	0	-	-	-	--	0	-	++
830	++	-	--	-	--	-	0	--	0	-	--	-	-	+
844	++	-	-	-	-	-	-	-	-	-	--	0	-	+
858	+	-	--	-	+	-	-	-	0	-	-	0	-	+
984	+	-	-	-	+	-	-	-	0	-	-	0	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
986	++	-	-	-	--	-	-	-	-	-	--	0	-	+
1003	++	-	--	-	--	-	0	-	0	-	--	-	-	+
1018	++	-	-	-	--	-	0	-	0	-	--	0	-	+
1020	+	-	-	-	-	-	-	-	0	-	-	0	-	+
1022	++	-	--	-	--	--	--	-	-	-	--	-	-	-
1026	+	-	-	-	--	-	0	-	0	-	-	0	-	+
1030	+	-	-	-	+	-	-	-	0	-	-	-	-	+
1063	+	-	-	-	+	-	0	-	-	-	-	0	-	+
1075	++	-	-	-	--	-	-	-	-	-	--	-	-	+
1095	++	-	-	-	--	--	-	-	-	-	--	-	-	+
1105	++	-	--	-	--	--	-	-	-	-	--	-	-	+
1120	++	-	-	-	-	-	0	-	-	-	--	0	-	+
1121	++	+	++	++	-	+	-	-	0	++	--	0	+	-
1123	++	-	++	++	-	-	-	+	0	++	--	0	+	-

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E.3 Mitigating effects of draft policies

E.3.1 Introduction

E.3.1.1 The sustainability appraisal of 42 reasonable alternative allocations against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Table E.2.1**). The purpose of this chapter is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.

E.3.1.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.

E.3.1.3 SA is an iterative process of assessment which feeds back into the plan-making process. Where sites are selected as being a ‘preferred option’ for allocation on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of any identified adverse effects. If it is not possible to mitigate identified adverse effects, these will remain at the end of the SA process and will be declared in the Environmental Report, which is prepared at the Regulation 19 stage.

E.3.1.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies. **Tables E.3.1 – E.3.14** list the identified adverse impacts according to SA Objectives and list the policies from the draft Mid Sussex DPR that might reasonably be expected to help mitigate identified adverse effects.

E.3.1.5 Each table has three columns. Column one lists the adverse effect, column two lists relevant planning policies and the final column indicates the extent to which these policies would be expected to mitigate each identified adverse effect.

E.3.2 SA Objective 1 – Housing

E.3.2.1 No direct adverse impacts are anticipated as a result of the proposed development at any of the reasonable alternative sites.

E.3.2.2 Policies DPN4, DPC4 and DPC5 relate to the protection of ancient woodland, the High Weald AONB and the South Downs National Park. The protection afforded to these environmental designations may constrain the delivery of housing development in some locations.

E.3.3 SA Objective 2 – Health and Wellbeing

E.3.3.1 **Table E.3.1** presents the identified adverse impacts on health and wellbeing, and the likely impacts post-mitigation.

Table E.3.1: Identified adverse impacts and potential mitigation for SA Objective 2 – Health and Wellbeing

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to health facilities and services	<p>Policy DPH4 states that housing allocations should contribute towards necessary infrastructure provision including health care facilities and Policy DPI1 seeks to secure infrastructure and protect existing services and facilities including those that provide health care.</p> <p>Policy DPI2 could help to ensure that impacts of development on infrastructure, including healthcare and community facilities and services, are mitigated through setting out the process of planning obligations.</p> <p>Various policies including DPS6, DTB1, DTB9, DPT4, DPH3, DPH4 and DPH36 could help to ensure new residents have good access to public transport to reach community facilities.</p>	<p>These policies would be likely to improve site end users’ access to healthcare; however, the policies would not be expected to fully mitigate the existing restricted access to these services in all locations, especially in terms of providing sustainable connections for rural areas of Mid Sussex to NHS hospitals.</p>
Limited access to leisure facilities and services	<p>Policy DPI5 sets out standards for provision of new open space, sports and recreational facilities alongside new developments and as stand-alone developments.</p> <p>Policy DPE7 supports leisure and tourism related development within rural areas which would likely improve access for residents living in those areas.</p> <p>Policy DPN3 seeks to protect and enhance areas of greenspace through green infrastructure provision.</p> <p>Policies DPI1 and DPI3 would be expected to protect leisure facilities through ensuring major infrastructure developments protect existing facilities serving the community.</p>	<p>These policies would be likely to improve access to leisure facilities for development proposals within or in the outskirts of settlements which contain existing leisure centres. However, these policies would not be expected to fully mitigate the existing restricted access to these services for residents of more rural areas within Mid Sussex.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to, and the net loss of, natural green spaces</p>	<p>Policy DPH4 sets out various criteria for housing allocations including access to natural greenspaces.</p> <p>Policy DPI5 seeks to ensure that existing open space with recreational value is protected from development and sets out standards for new open space provision alongside new developments.</p> <p>Policy DPC6 sets out criteria for the contribution to provision of Suitable Alternative Natural Greenspace (SANG) for recreational use with the aim of reducing recreational impacts at Ashdown Forest SPA and SAC.</p> <p>Policy DBP1 seeks to ensure that developments incorporate greenspace into the overall character and design of proposals.</p>	<p>These policies would be expected to mitigate the limited access to public greenspace and community open spaces and ensure that no existing green space with public value is lost to development.</p>
<p>Increase in, and exposure to, air and noise pollution (including from AQMAs and main roads)</p>	<p>Policy DPN9 wholly regards air pollution within the Plan area and seeks to reduce exposure to areas of poor air quality and sets out the requirement for Air Quality Assessments for major developments within or in close proximity to an AQMA. The policy also sets out requirements for air quality mitigation measures and to ensure developments make positive contributions towards the aims of the Council's Air Quality Action Plan.</p> <p>Policy DPH4 sets out various criteria for housing allocations including avoidance or mitigation of air pollution within proposals.</p> <p>Several of the policies, including Policy DPT1, seek to prioritise sustainable and active modes of travel which would contribute towards a reduction in traffic-related emissions.</p> <p>Policy DPB1 promotes high quality design of new developments which aim to ensure the development does not result in, or is exposed to, excessive noise pollution.</p>	<p>These policies would not be expected to fully mitigate the impacts of transport associated emissions and noise pollution from new development proposals located in close proximity to the AQMA or main roads.</p>
<p>Limited access to the PRoW or cycle network</p>	<p>Policy DPH4 includes criteria for housing allocations to safeguard the PRoW network and ensure the provisions of convenient cycling and walking routes.</p> <p>Policy DPT1 seeks to ensure developments prioritise sustainable and active modes of travel with safe and convenient routes for walking and cycling.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility to PRoW and cycle networks for the majority of proposed development sites.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPT2 regards the protection and provision of rights of way and other recreational routes, including Sustrans national cycle routes.</p> <p>Policy DPN3 encourages proposals to explore opportunities for integrating PRow, footpaths, bridleways and cycle routes into the multi-functional GI network to improve connectivity.</p>	

E.3.4 SA Objective 3 – Education

E.3.4.1 **Table E.3.2** presents the identified adverse impacts on education and the likely impacts post-mitigation.

Table E.3.2: Identified adverse impacts and potential mitigation for SA Objective 3 – Education

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to primary and secondary schools.</p>	<p>Policy DPH4 seeks to ensure that all new development contributes towards necessary infrastructure provision including education capacity as required by Policy DP1.</p> <p>Policy DPH34 outlines the criteria in which rural exception sites should meet in order to be deemed sustainable, including being ideally located in close proximity to a primary school.</p> <p>Policy DPI6 supports the provision or improvement of community facilities in order to create sustainable communities, including educational facilities.</p> <p>Policy DPH29 seeks to ensure that sites proposed for Gypsy and Traveller accommodation are located in a reasonably accessible location to educational facilities.</p>	<p>These policies would improve sustainable transport provision and ensure that major developments are located within reasonable walking distances to primary education, however, these policies would not be expected to fully mitigate adverse impacts on poor accessibility to education in all locations in this largely rural district, particularly in relation to providing sustainable access to secondary schools.</p> <p>Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances to reach secondary education, such that not all pupils will be within walking distance.</p> <p>The development of new and expanded schools on ‘significant sites’ identified in the DPR would improve access by locating site-end users in closer proximity to primary education or increasing capacity at existing schools.</p> <p>Overall, assuming that the majority of journeys to secondary schools would be by sustainable transport modes as advocated by the DPR policies, such as public transport or school buses, the policies would be expected to reduce the potential for negative impacts associated with accessibility to education.</p>

E.3.5 SA Objective 4 – Community and Crime

E.3.5.1 **Table E.3.3** presents the identified adverse impacts on community and crime and the likely impacts post-mitigation.

Table E.3.3: Identified adverse impacts and potential mitigation for SA Objective 4 – Community and Crime

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to or loss of community facilities</p>	<p>Policy DPI6 seeks to support the provision or improvement of community and cultural facilities and local services and outlines the contribution requirements for new residential development regarding these facilities. The policy would also resist the loss of existing community or cultural facilities, unless there is objective evidence that the service is surplus to requirement.</p> <p>Policy DPI2 regards the planning obligations for new developments in relation to the provision of these facilities.</p> <p>Policy DPI5 regards the protection and provision of open space, sport and recreational facilities and would be expected to improve access to these facilities.</p> <p>Policy DPE4 supports development within a defined town or village centre and would be expected to improve access to local services. The policy also seeks to reduce impacts of retail developments outside of these centres through retail impact assessments.</p> <p>Various policies including DPT1 would be expected to improve access to local services through improvements to sustainable transport provision or enhancement.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote community cohesion, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations (assessed as those over 150m from a defined Built up Area Boundary, in agreement with MSDC).</p> <p>The policies would however be expected to mitigate the potential loss of existing community facilities.</p>

E.3.6 SA Objective 5 – Flooding

E.3.6.1 **Table E.3.4** presents the identified adverse impacts on flooding and the likely impacts post-mitigation.

Table E.3.4: Identified adverse impacts and potential mitigation for SA Objective 4 – Flooding

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Risk of fluvial flooding	<p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of fluvial flooding or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach to ensure that the appropriate uses are located in areas at greater flood risk from all sources. This policy requires development to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPH4 sets out general principles for housing allocations and includes criteria for flood risk management of a site including Flood Risk Assessments and SuDS.</p> <p>Policy DPN3 seeks to ensure that development proposals make contributions to GI networks.</p> <p>Policy DPS12 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.</p>	<p>These policies would not be expected to fully mitigate fluvial flooding within proposed development sites where the entirety or the majority of the site coincides with high-risk areas (Flood Zone 3).</p>
Risk of surface water flooding	<p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of flooding, including surface water flooding, or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach to ensure that the appropriate uses are located in areas at greater flood risk from all sources. This policy requires development to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPH4 sets out general principles for housing allocations and includes criteria for flood risk management of a site including Flood Risk Assessments and SuDS.</p> <p>Policy DPN3 seeks to ensure that development proposals make contributions to GI networks.</p>	<p>Overall, these policies would be expected to mitigate the risk of surface water flooding and would seek to prevent the exacerbation of surface water flood risk in surrounding areas.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DPS12 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.	

E.3.7 SA Objective 6 – Natural Resources

E.3.7.1 **Table E.3.5** presents the identified adverse impacts on natural resources and the likely impacts post-mitigation.

Table E.3.5: Identified adverse impacts and potential mitigation for SA Objective 6 – Natural Resources

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Loss of greenfield / previously undeveloped land with an ecological or landscape value and loss of BMV land	<p>Policies DPH34 and DPS3 promote the efficient use of land.</p> <p>Policy DPN10 supports the remediation of contaminated land and as such could encourage the redevelopment of previously developed land.</p> <p>Policy DPC1 supports rural growth where development will not lead to a significant loss of high-grade agricultural land.</p> <p>Policies DPC4 and DPC5 supports development within either the High Weald AONB or South Downs National Park only where developments would conserve or enhance these areas of landscape value.</p>	The majority of potential sites for development in Mid Sussex comprise previously undeveloped land. These policies would not be expected to mitigate the loss of greenfield land, or the loss of ALC Grades 1, 2 and 3 land, due to the nature and scale of the development proposed in the MSDPR.
Sterilisation of mineral resources within Mineral Safeguarding Areas	Policies DPH4 and DPC1 set out criteria that development proposals must adhere to which would be likely to ensure that mineral resources are not unnecessarily sterilised by development and that areas of existing mineral supply infrastructure are protected.	The policies seek to prevent the sterilisation of mineral resources from development. These policies would be expected to ensure safeguarded minerals are protected or extracted prior to development, where viable, within identified MSAs.

E.3.8 SA Objective 7 – Biodiversity

E.3.8.1 **Table E.3.6** presents the identified adverse impacts on biodiversity and the likely impacts post-mitigation.

Table E.3.6: Identified adverse impacts and potential mitigation for SA Objective 6 – Biodiversity

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Threats or pressures to Habitats sites (SAC, SPA and Ramsar sites)	<p>Policy DPC6 sets out criteria for new development to meet to help prevent adverse effects on the Ashdown Forest SPA and SAC, including mitigation requirements. Policy DPC3 directs development proposals to the criteria as set out within Policy DPC6.</p> <p>Policy DPN9 would be expected to help protect Ashdown Forest SPA and SAC against impacts of poor air quality relating to new development and potential areas of increased traffic.</p>	<p>An HRA is being prepared to accompany the DPR which will consider potential for likely significant effects on Habitats sites including through change in air quality and water resources, amongst others. At the time of writing, the conclusions of the HRA are not available. The extent to which these policies mitigate potential negative impacts on Habitats sites is uncertain at this stage.</p>
Threats or pressures to nationally designated sites (SSSIs)	<p>Policy DPN1 recognises the importance of natural capital assets, including SSSIs, within the Plan area and would be expected to ensure that development proposals demonstrate that designated sites are protected according to their importance and ecological contribution.</p>	<p>The policy would be expected to fully mitigate potential impacts of developments on SSSIs.</p>
Threats or pressures to ancient woodland and veteran trees	<p>Policies DPN1 and DPN4 recognise the importance of areas of ancient woodland and seek to protect them from adverse impacts arising from development.</p> <p>Additionally, the policies seek to protect veteran trees.</p>	<p>These policies would make positive contributions to protecting ancient woodland and veteran trees. However, due to the proximity of some sites being coincident or adjacent to areas of ancient woodland and/or veteran trees there is the potential for adverse impacts on ancient woodland for some sites at this stage.</p>
Threats or pressures to locally designated sites and non-designated sites (LNR, LWS and priority habitats)	<p>Policies DPN1, DPN2, DPN3 and DPN4 recognise the importance of locally designated sites, which includes LNRs and Local Wildlife Sites, and non-designated sites such as priority habitats and would ensure that development proposals deliver biodiversity net gain and incorporate GI where possible.</p>	<p>These policies would make positive contributions to protecting designated and non-designated biodiversity assets. Disturbance of an adjacent LNR and loss / degradation of priority habitat would be anticipated with development of some sites. Although the provision of additional GI would be expected to contribute towards mitigating this</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
		impact, policies would not be expected to fully mitigate this impact.
Loss / degradation of GI and ecological networks	<p>Policies DPN1 and DPN3 would ensure protection and enhancement of green and blue infrastructure across the plan area and therefore contribute to mitigating negative ecological impacts associated with development.</p> <p>Policy DPN2 requires all development proposals to deliver a minimum of 10% biodiversity net gain as set out in legislation (or as amended by the government).</p> <p>Policies DPS1, DPS2 and DPH2 set criteria for ensuring developments provide or contribute to green and blue infrastructure, which would help to mitigate climate change impacts.</p>	<p>The Local Plan policies would be expected to mitigate potential negative ecological impacts associated with development, as they would be expected to ensure that development contributes to the creation, enhancement and protection of Mid Sussex’s GI network and ecological assets, including through the delivery of a minimum of 10% biodiversity net gain and 20% biodiversity net gain for Significant Sites.</p>

E.3.9 SA Objective 8 – Landscape

E.3.9.1 **Table E.3.7** presents the identified adverse impacts on landscape and the likely impacts post-mitigation.

Table E.3.7: Identified adverse impacts and potential mitigation for SA Objective 8 – Landscape

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Effects on the setting of the High Weald AONB	<p>Policy DPC4 relates directly to the High Weald AONB and seeks to ensure that development within the AONB conserves and enhances its qualities (as set out in the High Weald AONB Management Plan) and remains in keeping with the landscape character.</p> <p>Policy DPC1 aims to protect and enhance the countryside and seeks to ensure that development proposals, in order to be supported, are informed by landscape character assessment.</p> <p>Policies DPC3 and DPH4 regard the criteria for developments to meet including those located within the High Weald AONB.</p> <p>Policy DPB1 promotes high quality design and seeks to ensure that development proposals</p>	<p>Identified adverse impacts on the setting of the High Weald AONB from development proposals would be expected to be mitigated by these policies.</p> <p>However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals for Sites 198 and 984 which coincide with the AONB and are identified as having the potential to have a ‘moderate’ impact on the character of the landscape. As such, these policies would not be expected to fully mitigate adverse impacts at these sites and there remains the potential for significant</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>make positive contributions to the landscape and respond appropriately to their surroundings.</p> <p>Policy DPI4 seeks to ensure that communications infrastructure development does not lead to impacts on areas of landscape importance.</p>	<p>adverse effects on this designated landscape.</p>
<p>Effects on the setting of the South Downs National Park</p>	<p>Policy DPC5 regards the setting of the South Downs National Park and sets criteria for development proposals to protect the special qualities of the landscape.</p> <p>Policy DPC1 aims to protect and enhance the countryside and ensures that development proposals, in order to be supported, are informed by landscape character assessment.</p> <p>Policies DPC3 and DPH4 regard the criteria for developments to meet which could help protect the setting of the South Downs National Park.</p> <p>Policy DPB1 promotes high quality design and seeks to ensure that development proposals make positive contributions to the landscape and respond appropriately to their surroundings.</p> <p>Policy DPI4 seeks to ensure that communications infrastructure development does not lead to impacts on areas of landscape importance.</p>	<p>Identified adverse impacts on the setting of the South Downs National Park from development proposals would be expected to be mitigated by these policies.</p> <p>However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals for Sites 13, 19, 575, 799, 986, 1022 and 1095 which are located in close proximity to the South Downs National Park and some of these sites comprise significantly large areas of undeveloped land. As such, these policies may not fully mitigate adverse impacts at these sites.</p>
<p>Threaten or result in the loss of rural and locally distinctive landscape character</p>	<p>Various policies would be expected to ensure that development proposals consider landscape character including Policies DPC1, DPC3, DPN2, DPN3, DPH29, DPH34 and DPI4, for example for biodiversity net gain and green infrastructure provision and developments regarding Gypsy and Traveller sites, as well as developments within rural areas.</p> <p>Policy DPB1 seeks to ensure that new developments are of high quality and conserve and enhance their surroundings. Policies DPH2 and DPH3 regard sustainable development within and outside of built-up areas, and proposals</p>	<p>These policies would help to mitigate adverse impacts on the landscape character arising from the proposed development, to some extent.</p> <p>However, many sites are located in areas in the Landscape Capacity Study (2007)¹ identified as being of low to negligible capacity for residential development. These policies are not expected to fully mitigate the potential impacts on landscape character in Mid Sussex and there remains the potential for minor adverse impacts.</p>

¹ Mid Sussex District Council (2007) Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/7712/08_08_mid_sussex_landscape_capacity_study.pdf [Date Accessed: 02/02/2022]

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>which fall into these categories must adhere to the criteria set out within Policy DPB1.</p> <p>Policies DPB2 and DPB3 seek to ensure the conservation, enhancement and enjoyment of Mid Sussex’s historic character and heritage assets.</p>	
<p>Development threatens areas of high landscape sensitivity / capacity</p>	<p>Policies which include requirements for development to conserve and enhance the surrounding landscape, such as Policies DPC1, DPC2, DPC3, DPC4, DPC5 and DPB1, would be expected to contribute towards the protection of sensitive landscapes from development pressures.</p> <p>Policy DPC2 seeks to prevent coalescence of settlements to maintain separate identities of individual towns and villages within the Plan area.</p>	<p>Local plan policies would help to reduce adverse impacts on the landscape. However, it is unlikely that impacts on areas identified as being of ‘low’ landscape capacity and ‘high’ landscape sensitivity, as identified within the 2007 Landscape Capacity Study, could be mitigated through policy, as these areas are stated to be unable to accommodate development without a minor adverse impact on landscape character.</p>
<p>Impacts on Country Parks</p>	<p>Although no policies directly refer to the protection or enhancement of country parks and their setting, various policies including DPB1, DPN3 and DPH4 could help to reduce adverse impacts by ensuring development proposals are of high-quality design, well-related to their surroundings and incorporate GI.</p>	<p>Local plan policies would be expected to mitigate identified adverse impacts on the Worth Way Country Park.</p>
<p>Change in views experienced by users of the PRow network / local residents</p>	<p>Policies S5, S7 and T41 would be expected to respect visual amenity and ensure development proposals incorporate designs which enhance appearance and retain important views, as well as ensuring that development takes account of the setting and character of the local area.</p>	<p>These policies would be likely to help to mitigate the impact of development on views experienced by users of the PRow network and local residents, to some extent, and particularly for sites within more urbanised areas. However, due to the scale of development proposed in some locations this policy is not expected to fully mitigate this impact for more rural sites.</p>
<p>Increase risk of coalescence / urban sprawl</p>	<p>Policy DPC2 seeks to prevent coalescence of settlements to maintain separate identities of individual towns and villages within the Plan area.</p> <p>Policies DPH4 and DPB1, which seek to promote high quality design and the integration of GI amongst development, may help to reduce some</p>	<p>These policies may help to reduce some of the negative impacts associated with integration of new development into the countryside. However, due to the rural context in which some of the new development is situated, the policies</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	of the negative impacts associated with integration of new development into the countryside and limit the impacts associated with urban sprawl.	would not be expected to fully mitigate these impacts.

E.3.10 SA Objective 9 – Cultural Heritage

E.3.10.1 **Table E.3.8** presents the identified adverse impacts on cultural heritage and the likely impacts post-mitigation.

Table E.3.8: Identified adverse impacts and potential mitigation for SA Objective 9 – Cultural Heritage

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Potential direct impacts on heritage assets (Listed Buildings, Conservation Areas and Registered Parks and Gardens).</p>	<p>Policies DPB2 specifically regards the protection of Listed Buildings and other heritage assets within the Plan area. Additionally, DPB3 outlines criteria for proposed developments within Conservation Areas to adhere to protect the settings of Conservation Areas and assets within them.</p> <p>Policy DPN5 seeks to protect the character, appearance and setting of a registered park or garden.</p> <p>Policy DPC3 regards new homes within the countryside and supports proposals where the development leading to the re-use of non-designated heritage assets such as rural buildings would lead to securing the asset’s future.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including conserving and enhancing designated and non-designated heritage assets.</p>	<p>These policies would be expected to ensure that no heritage assets are lost as a result of development, apart from in exceptional circumstances. The policies would also be expected to mitigate potential negative impacts on the character and setting of heritage assets arising from development proposals in close proximity to heritage assets.</p>
<p>Alteration of character or setting of a heritage asset (Listed Buildings, Conservation Areas and</p>	<p>Policies DPB2 specifically regards the protection of Listed Buildings and other heritage assets within the Plan area. Additionally, DPB3 outlines criteria for proposed developments within Conservation Areas to adhere to protect the settings of Conservation Areas and assets within them.</p>	<p>These policies would be expected to mitigate potential negative impacts on the character and setting of heritage assets arising from development proposals in close proximity to heritage assets, however, the potential impacts of development on heritage assets depends on the detailed nature of the proposals and how these changes may</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Scheduled Monuments).</p>	<p>Policy DPB1 sets out various criteria to achieve high quality design including the conservation of cultural and heritage assets and their settings.</p> <p>Policy DPN5 seeks to protect the character, appearance and setting of a registered park or garden.</p> <p>Policy DPC4 regards the conservation and protection of the High Weald AONB historic landscape features, including the conservation of cultural heritage assets.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including conserving and enhancing designated and non-designated heritage assets.</p>	<p>affect the significance of the heritage asset. At this stage of the planning process, there remains the potential for adverse impacts on settings on heritage assets as a result of development at the following sites: 13, 18, 575 and 799.</p>
<p>Alteration of character or setting of archaeological features</p>	<p>Policy DPB2 seeks to conserve heritage assets within the Plan area including those of archaeological interest.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including requirements to undertake desk-based archaeological surveys prior to submission of planning applications.</p> <p>Policy DPI4 ensures that development proposals for communications infrastructure do not have an unacceptable effect on various receptors including archaeological sites.</p>	<p>Without a greater understanding of the significance of the heritage assets affected (and the potential for, as yet undiscovered, below ground assets) and details of the development proposals there remains a level of uncertainty in the assessment of impacts on the historic environment.</p>

E.3.11 SA Objective 10 – Climate Change and Transport

E.3.11.1 **Table E.3.9** presents the identified adverse impacts on climate change and transport and the likely impacts post-mitigation.

Table E.3.9: Identified adverse impacts and potential mitigation for SA Objective 10 – Climate Change and Transport

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Generation of carbon emissions from increased traffic	<p>Policy DPS1 seeks to address the causes of climate change through an integrated and holistic approach and promotes active travel and sustainable transport throughout the Plan area, as well as various other policies which promote these criteria within the Plan such as DPH4 and DPT1.</p> <p>Policy DPT4 sets out criteria for new developments to incorporate electrical vehicle charging infrastructure which would help to promote use of these vehicles and reduce emissions.</p>	<p>Whilst these policies would seek to ensure current carbon emissions within the Plan area do not increase further, it is likely that these policies would not fully mitigate the impacts from new development on traffic related carbon emissions.</p>
Limited access to bus services and train stations	<p>Although there are no policies within the Plan which regard improving access to railway stations, various policies such as Policy DPT1 could help to enhance highway networks and public transport provision which may increase access to railway stations.</p>	<p>This policy would be expected to improve access to bus stops, and to railway stations for development proposals within or in the outskirts of settlements which contain an existing railway station.</p> <p>However, this policy would not be anticipated to fully mitigate the restricted access to railway stations in the remaining more rural settlements or those without an existing station.</p>
Limited access to local services and facilities	<p>Policies DPT1, DPT2 and DPT3 would be expected to improve access to local services through sensitive land use planning and improvements to sustainable transport provision. Policy DPE7 in particular sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote community cohesion, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPI6 supports proposals for the provision of community and cultural facilities and local services and resists the loss of existing community facilities.</p>	
<p>Lack of safe pedestrian / cycle access</p>	<p>Policies DPT2 and DPT3 support protection and enhancement of PRoWs, recreational routes and cycleways through new development which should link to the existing cycle and pedestrian network.</p> <p>DPH4 outlines that new development should meet various criteria to create and enhance multi-purpose rights of way for pedestrians and cyclists. The policy also seeks that new development provides new connections to existing corridors of the existing GI network.</p> <p>Various other policies, including DPS1, DBPI, DPT1 and DPS6 encourage proposals to explore opportunities for integrating PRoW, footpaths, bridleways and cycle routes into current networks to improve connectivity.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility to PRoW and cycle networks for the majority of proposed development sites.</p>



E.3.12 SA Objective 11 – Energy and Waste

E.3.12.1 **Table E.3.10** presents the identified adverse impacts on energy and waste and the likely impacts post-mitigation.

Table E.3.10: Identified adverse impacts and potential mitigation for SA Objective 11 – Energy and Waste

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increased energy consumption related GHG emissions.</p>	<p>Policy DPS3 supports renewable and low carbon projects, including community-led schemes and outlines that new development should provide opportunities for incorporating decentralised, renewable and low carbon energy schemes.</p> <p>Policy DPB1 seeks to ensure that all development contributes to the reduction of carbon emissions throughout the design, construction and operation stages and that new homes are to be as energy efficient and sustainable as possible using BREEM standards. The policy sets out that all new build major residential and non-residential development should take opportunities to be net zero carbon.</p> <p>Policy DPH4 sets out various criteria for housing allocations to achieve including the delivery of net zero carbon and maximum possible use of renewable energy technologies. Through this policy, new homes from 2025 are to be designed as energy efficient as possible to achieve net-zero goals throughout their lifetime. Policies DPS1 and DPS2 also support net zero carbon development and improvements in energy efficiency to achieve these goals through sustainable design and construction methods.</p>	<p>In June 2021, Mid Sussex Council commissioned climate change experts to help achieve net zero carbon throughout the district by 2050².</p> <p>Although these policies would be expected to have a positive impact in helping to reduce emissions associated with the occupation of housing and mixed use sites, they would not be expected to fully mitigate this impact and would be unlikely to facilitate sufficient reductions in carbon emissions to fully achieve net zero within the plan period.</p>
<p>Increase in household waste.</p>	<p>Although there are no policies within the Plan which regard reducing household waste, various policies contribute to this aim.</p> <p>Policies DPI1, DPI2 and DPI3 would help to secure necessary infrastructure to help meet the needs of current residents which may include enhancement of waste and recycling infrastructure.</p>	<p>These policies seek to mitigate waste production in line with objectives set out under the Sustainability Strategy³ and would help to mitigate identified adverse impacts.</p>

² Mid Sussex District Council (2022) Climate and Environmental Sustainability. Available at: <https://www.midsussex.gov.uk/environment/climate-and-environmental-sustainability/> [Date accessed: 29/09/22]

³ Ibid

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPS2 seeks to ensure that all development follows the waste hierarchy to minimise the amount of waste disposed to landfill and maximise recycling rates.</p> <p>Various policies including DPE6 and DPH4 aim to improve recycling provisions to help minimise waste leading to landfill.</p>	

E.3.13 SA Objective 12 – Water Resources

E.3.13.1 **Table E.3.11** presents the identified adverse impacts on the economy and the likely impacts post-mitigation.

Table E.3.11: Identified adverse impacts and potential mitigation for SA Objective 12 – Water Resources

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increased risk of watercourse pollution</p>	<p>Policy DPS5 wholly regards the protection and enhancement of water resources and water quality and sets out measures to for new developments to help control pollution of the water environment.</p> <p>Policy DPS2 sets out criteria to achieve sustainable design and construction including the requirement for development to minimise its impact on water resources and water quality</p> <p>Policy DPN1 sets out to protect and enhance biodiversity assets within the Plan area through development proposals meeting various criteria which would help to protect habitats including those within the water environment.</p> <p>Policy DPN3 seeks to deliver a range of green and blue infrastructure within proposals of new developments as well as protect existing green and blue infrastructure assets and links such as watercourses. Furthermore, various policies such as DPS1 and DPH4 set out GI requirements to achieve their aims, where the provision of GI resources could help to protect the water environment from pollution impacts.</p>	<p>These policies would be expected to effectively manage and mitigate the potential adverse impacts on the contamination of watercourses within the Plan area arising through development proposals.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Unsustainable levels of water consumption</p>	<p>Policy DPS5 seeks to protect and enhance water resources and supports development proposals where they demonstrate that there is adequate water supply to serve the development. Additionally, the policy supports development or expansion of water supply infrastructure to serve current or future development or to improve long-term water supply. Policies DPI1, DPI2 and DPI3 seek to support infrastructure provisions and provides criteria for these developments.</p> <p>Policy DPS2 provides criteria to meet sustainable development standards and includes requirements for developments to meet relevant water consumption standards, e.g. 100 litres a day per household. This policy seeks to provide water neutrality through new developments and promote water efficiency measures through reducing water use and recycling water, for example through greywater recycling.</p> <p>Policy DPH4 provides various criteria for housing allocation developments to adhere to including the minimisation of water consumption, through criteria set out within other Plan polices.</p>	<p>The Gatwick Sub Region Water Cycle Study⁴ comprises a large proportion of Mid Sussex District and states that water resources are under significant pressure. The study explores water companies' strategies to manage water supplies in the context of water resource availability in the region.</p> <p>These policies, along with adherence to national legislation and guidance from studies such as the Water Cycle Study, would be expected to effectively manage and mitigate the potential adverse impacts on water resources for future use within the Plan area arising through development proposals.</p>

⁴ Entec (2011) Gatwick Sub Region – Outline Water Cycle Study. Available at: <https://www.midsussex.gov.uk/media/2608/water-cycle-study-outline-report.pdf> [Date Accessed: 26/01/22]

E.3.14 SA Objective 13 – Economic Regeneration

E.3.14.1 **Table E.3.12** presents the identified adverse impacts on economic regeneration and the likely impacts post-mitigation.

Table E.3.12: Identified adverse impacts and potential mitigation for SA Objective 13 – Economic Regeneration

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to local services and facilities</p>	<p>Policies DPT1, DPT2 and DPT3 would be expected to improve access to local services through sensitive land use planning and improvements to sustainable transport provision. Policy DPE7 in particular sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p> <p>Policy DPI6 supports proposals for the provision of community and cultural facilities and local services and resists the loss of existing community facilities.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote regeneration of local centres through improved access, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations.</p>

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E.3.15 SA Objective 14 – Economic Growth

E.3.15.1 **Table E.3.13** presents the identified adverse impacts on economic growth and the likely impacts post-mitigation.

Table E.3.13: Identified adverse impacts and potential mitigation for SA Objective 14 – Economic Growth

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Net change in employment floorspace</p>	<p>Policy DPE1 sets out criteria to achieve sustainable economic development including supporting expansion of businesses and ensuring that major development proposals allocated within the Plan demonstrate how they would address identified local skills shortages and support local employment.</p> <p>Policy DPE2 seeks to protect existing employment sites and provides the criteria in which it would support development of sites for employment uses. The policy would ensure that employment sites will only be re-developed for non-employment uses where the existing use is unviable.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p> <p>Policy DPE6 supports development within primary shopping areas which meet various criteria set out within the policy and aims to ensure that the vitality and viability of these centres are not harmed.</p> <p>Policy DPE7 supports small scale economic development within rural areas including farm diversification and leisure and tourism related development.</p> <p>Policy DPE8 seeks to enhance the tourism economy of Mid Sussex.</p>	<p>It would be anticipated that these policies would mitigate any loss of employment floorspace as a result of residential development, with sufficient provision made elsewhere in the Plan area.</p> <p>However, the redevelopment of existing employment sites may lead to a change in the type and range of employment opportunities available within the Plan area.</p>

E.4 Post-mitigation site assessments

E.4.1 Overview

E.4.1.1 Following careful consideration of the mitigation effects of the Local Plan strategic, thematic and DM policies on the assessment findings, the post-mitigation assessment findings for all 42 reasonable alternative sites considered throughout the Mid Sussex DPR preparation have been presented in **Table E.4.1**.

Table E.4.1: Post-mitigation impact matrix for all reasonable alternative sites

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change and Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
13	+	-	0	++	+	-	+/-	-	-	++	0	0	++	+
18	++	-	-	-	-	--	-	-	-	-	-	0	-	++
19	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
198	+	0	0	0	+	-	-	--	0	-	0	0	-	+
210	+	-	++	++	+	-	+/-	-	0	-	0	0	++	+
503	++	0	-	-	+	--	-	-	0	-	-	0	-	+
508	+	0	-	0	+	-	+/-	-	0	-	0	0	+	+
526	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
543	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
556	+	0	0	+	-	-	-	-	0	-	0	0	-	+
573	+	-	++	0	+	-	+/-	-	0	-	0	0	-	+
575	++	-	-	-	+	--	-	-	-	-	-	0	-	+
601	++	-	-	-	+	-	-	-	0	-	-	0	-	+
617	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
631	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
678	++	-	-	-	-	--	-	-	0	-	-	0	-	+
686	++	0	0	0	+	-	-	-	0	-	-	0	-	+
688	++	-	0	-	+	-	-	-	0	-	-	0	-	+
736	++	-	-	-	-	--	-	-	0	-	-	0	-	++
740	++	-	0	-	-	--	-	-	0	-	-	0	-	++
743	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
784	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
789	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
799	++	-	0	-	+	--	+/-	-	-	-	-	0	-	++
830	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
844	++	-	0	0	+	-	+/-	-	0	-	-	0	-	+
858	+	0	-	-	+	-	-	-	0	-	0	0	-	+
984	+	-	0	+	+	-	-	--	0	-	0	0	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change and Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
986	++	-	0	-	+	-	-	-	0	-	-	0	-	+
1003	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
1018	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1020	+	0	0	0	+	-	+/-	-	0	-	0	0	-	+
1022	++	-	-	-	+	--	-	-	0	-	-	0	-	+
1026	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
1030	++	0	0	+	+	-	0	-	0	-	0	0	-	+
1063	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
1075	++	-	0	++	+	-	-	-	0	-	-	0	-	+
1095	++	-	0	-	+	--	-	-	0	-	-	0	-	+
1105	++	-	-	-	-	--	-	-	0	-	-	0	-	+
1120	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1121	++	++	++	++	+	+	0	-	0	++	-	0	++	+
1123	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+

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E.5 Recommendations

- E.5.1.1 A series of recommendations have been identified as to how the Mid Sussex DPR planning policies might be usefully expanded or modified to provide mitigation measures that will help further reduce the identified adverse effects associated with each SA Objective. The recommendations have been fed back to the Council to assist with their decision making as the DPR evolves.
- E.5.1.2 These recommendations are set out in **Table 5.3** of the main SA report.

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