

East Grinstead Neighbourhood Plan

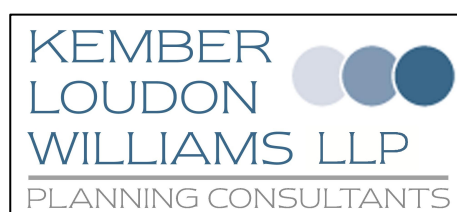
Sustainability Appraisal Report

July 2015

(updated November 2015)

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1 INTRODUCTION

- 1.1 This report represents the Sustainability Appraisal (SA) of the East Grinstead Neighbourhood Plan Consultation Draft. The SA has been reconsidered and reviewed in light of several representations made to the Neighbourhood Plan consultation that took place between 27th July 2015 and 21st September 2015. In particular, comments were received that identified further potential development sites that the Town Council consider ought to be considered within the SA.
- 1.2 A further careful review was made of the ‘Amber Sites’ identified in Mid Sussex District Council’s Strategic Housing Land Availability Assessment (“SHLAA”) 2015, and potential development sites identified by respondents to the consultation exercise. The Red development sites identified in the SHLAA 2015 have not been assessed in the SA because these land parcels have been carefully examined and discounted by the District Council as part of the SHLAA process. In view of this, and in considering the Red sites in the SHLAA, the Town Council considers it appropriate to rely on the conclusions reached by the District Planning Authority in its assessment of the SHLAA sites.
- 1.3 Strategic Environmental Assessment is a requirement of the EC Directive on the assessment of the effects of certain plans and programmes on the environment (Directive 2001/42/EC) known as the Strategic Environmental Assessment (SEA) Directive. This is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004, which applies to plans with significant environmental effects (SEA Regulations).
- 1.4 The purpose of the SA is to ensure and to demonstrate that the principles of sustainable development have been thoroughly considered throughout the process of drafting and refining the proposed neighbourhood plan. This document includes the requirements of SEA Directive. It will also be the case that Mid Sussex District Council will conduct an appropriate assessment of the East Grinstead Neighbourhood Plan at the Regulation 14 and 16 stages and again prior to ‘making’ the plan in order to comply with the Habitat Regulations.
- 1.5 The various stages of the Sustainability Appraisal relate to the different stages of the plan making process outlined below. The steps in Stage A culminated with the SA Scoping Report that was consulted on in December 2013. This report forms stages B and C and is known as the ‘Sustainability Appraisal Report’.

Plan Making Stage	Sustainability Stage	Undertaken
Laying the Foundations and Consulting with the Community	<p>Stage A: Setting context and objectives, establishing the baseline and deciding on the scope</p> <p>A1 Identifying other relevant policies, plans and programmes, and sustainable development objectives A2 Collecting baseline information A3 Identifying sustainability issues and problems A4 Developing the SA framework A5 Consulting on the scope of the SA (the ‘Scoping Report’)</p>	Work carried out between November 2011 and December 2013

Producing the draft Neighbourhood Plan	Stage B: Developing and refining options and assessing effects B1 Testing the NP objectives against the SA framework B2 Developing the NP options B3 predicting the effects of the draft NP B4 Evaluating the effects of the draft NP B5 considering ways of mitigating adverse effects and maximising beneficial effects B6 Proposing measures to monitor the significant effects of implementing the NP.	Work carried out between January 2014 and July 2015
	Stage C: Preparing the SA report C1 Preparing the SA report (this report)	Now
Refining the Neighbourhood Plan to take account of the Findings	Stage D: Consulting on the draft NP and Sustainability Appraisal report D1 Public participation on the SA report and the draft NP D2 Assessing significant changes ADOPTION OF Neighbourhood Plan D3 Making decisions and providing information	Future Action
Adopting the Neighbourhood Plan	Stage E: Monitoring the significant effects of implementing the NP E1 Finalising aims and methods for monitoring E2 Responding to adverse effects	Future Action

Neighbourhood Planning and Policy Context

- 1.6 The neighbourhood planning system is an opportunity for local people to create a new type of plan for delivering and regulating development within their area. The aims are to give local communities the power to develop a shared vision for their neighbourhood and to deliver the sustainable development needed to ensure that the right types of development is provided in the right locations. It also allows the opportunity to set out specific planning policies to be used in determining planning applications.
- 1.7 The right for communities to prepare a Neighbourhood Plan was established through the Localism Act in 2011. Upon adoption, the East Grinstead Neighbourhood Plan will become part of the statutory Development Plan alongside the plans prepared by Mid Sussex District Council.
- 1.8 The Mid Sussex District Plan will remain the overriding strategy for the District and the Neighbourhood Plan must be consistent with its strategic objectives. The plan must also be in conformity with national planning policy set out in the National Planning Policy Framework (NPPF).

Document Structure

- 1.9 Chapter 2 provides feedback on the consultation responses received on the SA Scoping Report, details changes that have been made as a result of these responses and introduces the East Grinstead Neighbourhood Plan sustainability objectives.

- 1.10 Chapter 3 sets out the methodology for the Sustainability Assessment. It explains that 11 objectives were assessed against the plan objectives and policies and that the appraisal was based on a qualitative exercise. Chapter 4 tests the objectives of the plan while Chapter 5 tests the policies.
- 1.11 Chapter 6 provides a summary of the SA Report and identifies where improvements could be made.

2 SCOPING RESULTS

- 2.1 The Neighbourhood Plan Sustainability Appraisal Scoping Report was subject to a 5-week consultation between 9th December 2013 and 20th January 2014. A total of nine responses were received.
- 2.2 The responses have been collated and those that are of relevance to the SA have been considered and incorporated within this document. It is not a requirement of the SEA Directive that a revised version of the Scoping Report be issued.
- 2.3 The three statutory consultees Natural England, the Environment Agency (EA) and English Heritage were consulted. Natural England welcomed the need to recognise impacts on the Ashdown Forest and requested that consideration be given to screening proposals for significant impacts on local Sites of Special Scientific Interest (SSSI's) and Areas of Outstanding Natural Beauty (AONB's). It also felt consideration should be given to an objective to reflect the aim to halt the decline in biodiversity. The Environment Agency and English Heritage had no comments on the Scoping Report.
- 2.4 Taking account of Natural England's comments and those of non-statutory consultees objective 1 of the scoping assessment has been amended to read as follows:

'To protect the nationally important AONB landscape and the rural setting of East Grinstead and to maintain the areas of countryside constraint between the town and other nearby settlements'.

- 2.5 The revised Sustainability Objectives are set out in the table below.

	Objectives	Indicators
1	To protect the nationally important AONB landscape and the rural setting of East Grinstead and to maintain the countryside constraint between the town and other nearby settlements.	<ul style="list-style-type: none"> • Quality and gain/loss of woodland • Regular monitoring of the areas of countryside constraint and urban boundaries • Landscape capacity assessment performance
2	To ensure that those in need of local housing have the opportunity to live within the town in a sustainably constructed and affordable home of the appropriate type.	<ul style="list-style-type: none"> • Number of new affordable homes delivered • Trend of waiting list for social housing • Mix of housing types in relation to socio-demographic profile
3	To ensure that amenities for local residents including health, education, shopping, community and leisure facilities.	<ul style="list-style-type: none"> • Number and quality of existing and new facilities • Ratio between population numbers and these facilities • Range of retail provision
4	To ensure that future development complements and integrates with the unique character of the town, including the town centre and conservation areas.	<ul style="list-style-type: none"> • Level of support for projects from the local community • Number of visitors in the conservation areas • Number of Listed Buildings in Parish • Outcome of urban design and heritage assessment

5	To minimise the Parish's impact on climate change due to CO2 and other emissions from transport, domestic and industrial sources.	<ul style="list-style-type: none"> • New homes meeting building regulations level 4 or above of the Code for Sustainable Homes • Delivery of new housing within the built-up area • Delivery and maintenance of cycling and walking infrastructure • <u>Accessibility and convenience</u>
6	To protect, enhance and make accessible for enjoyment, the high quality and sensitive green spaces and thereby to minimise the impact of new development on the sensitive habitat of Ashdown Forest.	<ul style="list-style-type: none"> • Amount and quality of green areas • Accessibility: proportion of residential units within the built up area within a 10 min walk of a green space (available for leisure use) • Levels of screening of developments that otherwise would affect open areas and landscape • <u>Biodiversity surveys</u>
7	To reduce the need to travel by car for local journeys, reduce road congestion, and improve and promote travel by cycle, on foot and by public transport to and within the Parish.	<ul style="list-style-type: none"> • Traffic levels on the A22 • Service levels on bus routes serving East Grinstead • Delivery and maintenance of cycling and walking infrastructure • Proportion of visitors to town centre arriving by car • Proportion of journeys by residents made by car
8	To promote opportunities for employment within East Grinstead including the development of sustainable tourism.	<ul style="list-style-type: none"> • Number of jobs in the parish • Number of jobs by sector
9	To improve levels of accessibility and permeability to and within the town centre by providing safe, direct and attractive routes that encourage walking, cycling and use of public transport.	<ul style="list-style-type: none"> • Delivery and maintenance of cycling and walking infrastructure • Proportion of journeys to the town centre made on foot, by cycle and by public transport • Levels of traffic conflict in town centre (traffic and parking volumes in town centre streets, and frequency of pedestrian crossing movements)
10	To create opportunities for new retail and associated parking within the town centre that improves the quality and provision of the shopping experience.	<ul style="list-style-type: none"> • Range of retail offer • Vacant shops rate
11	To provide a greater mix of uses and residential accommodation, including affordable housing, within the town centre to increase and diversify its resident, visitor and workplace populations and to give family-orientated evening vitality.	<ul style="list-style-type: none"> • Mix and range of retail and leisure activities in the town centre • Housing mix (size and tenure) in relation to local demand

2.6 The above objectives have been used to test the compatibility of the objectives and policies of the Neighbourhood Plan against sustainability criteria. It is the combination of these objectives that creates the Sustainability Framework for “judging” the Neighbourhood Plan.

3 METHODOLOGY

- 3.1 The SA has been an iterative process between the stages of the plan production considering issues that have arisen as a result of the SA process. The report has been undertaken using published government guidance “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents” published by the Office of the Deputy Prime Minister (2005).
- 3.2 The appraisal of the Neighbourhood Plan has involved:
- *Appraising the proposed development management policies for East Grinstead; and*
 - *Appraising the sites to be allocated for specific development or protection.*
- 3.3 The appraisal was carried out using the SA Framework that was developed in the Scoping Report and has evolved following that initial consultation. The SA Framework consists of eleven objectives, set out in Section 2, against which the Plan objectives and policies were appraised. The appraisal was a qualitative exercise based on a balanced judgement.
- 3.4 The performance of the appraised features against each SA objective was given a score according to the criteria set out in the table below. When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:
- *Probability, duration, frequency and reversibility of effects;*
 - *Cumulative nature of effects;*
 - *Magnitude and spatial extent of the effects; and*
 - *Value and vulnerability of area likely to be effected.*

Assessment Criteria

Symbol	Likely SA Impact
+ +	The option is likely to have a very positive impact
+	The option is likely to have a positive impact
0	The option is likely to have a neutral impact
-	The option is likely to have a negative impact
- -	The option is likely to have a very negative impact

- 3.5 The methodology adopts the traffic light assessment approach rather than a numeric appraisal to ensure that each sustainability merit is judged in isolation and to avoid any potential to offset negative readings. For example, a very positive impact would not automatically offset two negative impacts.

Difficulties Encountered

- 3.6 There were some minor difficulties in undertaking the SA of the Plan, particularly in respect of uncertainties regarding the District’s proposed housing growth levels and distribution of development. These circumstances lie beyond the control of the Town Council and, therefore, assumptions have been made on the most up to date information available.

4 TESTING OF THE NEIGHBOURHOOD PLAN OBJECTIVES

- 4.1 Following close examination of all public consultation responses to date the Town Council has worked closely with the local community to develop a community vision for East Grinstead.
- 4.2 The vision seeks to 'provide for a positive future East Grinstead that is socially inclusive for all, vibrant, economically robust and will allow residents to live with a high degree of self-sufficiency in a town with a first rate natural, built and historic environment'.
- 4.3 In formulating this vision it has been made clear that the community requires coordinated and well-planned development, in the right location, to help sustain one of the finest historic market town environments in England. To achieve this the dominance and impact of motor traffic must be addressed, where possible, and investment in retail, employment, culture and community facilities/activities promoted to make East Grinstead a more attractive and pleasant place to live and work.
- 4.4 The community wishes for priority to be given to addressing the persistent issue of traffic congestion and delays on the main roads through the town, which acts as a constraint on growth and investment. Meeting this aim will require a combination of pragmatic traffic management and a focusing of efforts to achieve more sustainable travel choice. In time, the later will reduce the traffic burden and ease congestion. Once the basic highway conditions improve there will be greater scope and desire to promote the growth needed to support future generations.
- 4.5 Alongside creating a high quality place to live, the community wishes to maintain and improve a town centre that it can be proud of and that will attract visitors and investment in the area. Taking all of the above into consideration the plan's core objectives are to:
- 1) *Improve the town's urban, rural and historic environment and protected it from harmful development;*
 - 2) *Make prudent use of natural resources by promoting development on previously developed sites within the built up area boundary;*
 - 3) *Improve highway and infrastructure conditions, reduce the reliance on car use and provide attractive alternative means of travel;*
 - 4) *Provide quality new homes for existing and future residents within existing environmental and infrastructure constraints;*
 - 5) *To promote development that will provide sustainable economic growth, including business and tourism related development and maintain a prosperous town centre; and*
 - 6) *To protect the countryside and urban open spaces for their landscape, wildlife, agricultural, recreational and natural resource value, specifically including Ashdown Forest and Areas of Outstanding Natural Beauty.*

4.6 These six objectives have been tested in the context of the eleven elements of the Sustainability Framework. The findings are set out in the matrix overleaf.

		Sustainability Objectives										
		1	2	3	4	5	6	7	8	9	10	11
Neighbourhood Plan Objectives	1	++	0	+	0	0	+	0	-	+	0	-
	2	++	-	0	+	+	++	+	0	0	0	-
	3	0	0	0	0	++	0	++	+	++	-	0
	4	++	++	-	+	-	++	-	-	0	-	+
	5	-	0	+	0	0	-	0	++	0	++	+
	6	++	-	0	0	0	++	+	-	0	-	0

Sustainability Framework

- 1) *To protect the nationally important AONB landscape and the rural setting of East Grinstead and to maintain the areas of countryside restraint between the town and other nearby settlements.*
- 2) *To ensure that those in need of local housing have the opportunity to live within the town in a, sustainably constructed and affordable home of the appropriate type.*
- 3) *To ensure that amenities for local residents including health, education, shopping, community and leisure facilities are maintained and improved.*
- 4) *To ensure that future development complements and integrates with the unique character of the town, including the town centre and conservation areas.*
- 5) *To minimise impact on climate change due to CO2 and other emissions from transport, domestic and industrial sources.*
- 6) *To protect, enhance and make accessible for enjoyment, the high quality and sensitive green spaces and thereby to minimise the impact of new development on the sensitive habitat of Ashdown Forest.*
- 7) *To reduce the need to travel by car for local journeys, reduce road congestion, and improve and promote travel by cycle, on foot and by public transport.*
- 8) *To promote opportunities for employment within East Grinstead including the development of sustainable tourism.*
- 9) *To improve levels of accessibility and permeability to and within the town centre by providing safe, direct and attractive routes that encourage walking, cycling and use of public transport.*
- 10) *To create opportunities for new retail and associated parking within the town centre that improves the quality and offer of the shopping experience.*
- 11) *To provide a greater mix of uses and residential accommodation, including affordable housing, within the town centre to increase and diversify its resident, visitor and workplace populations and to give family-orientated evening vitality.*

Commentary

Plan Objective 1): To improve the town's urban, rural and historic environment and protect it from harmful development

The Objective does not prevent development but attaches a high test in terms of the considerations that must be met for new development to proceed. In some instances this may restrict development for housing and other uses and so the objective may score negatively in relation to Sustainability objectives 2, 8, 10 and 11.

Plan Objective 2): To make prudent use of natural resources by promoting development on previously developed sites

This Plan Objective scores well against all the testing objectives in the SA. It helps protect green spaces and rural areas, ensures that development is related well to existing infrastructure and provides opportunities for all types of development. The objective now concentrates development within the built up area. Given the protection afforded to Ashdown Forest renewing, enhancing and redeveloping previously developed sites, is a highly sustainable approach. The majority of SA objectives would be positively scored. It may be the case that the number of previously developed sites cannot meet needs and so there may be a negative score in relation to SA objectives 2, 8, 10 and 11.

Plan Objective 3): To improve highway and infrastructure conditions, reduce the reliance on car use and provide attractive alternative means of travel

This objective will have limited material impact on protecting rural areas, and green spaces. However, the objective to match new development with highway infrastructure, to improve that where necessary and to reduce the harmful effects of traffic pollution will positively meet the tests of all of the Plan objectives.

Plan Objective 4): To provide quality new homes for existing and future residents within existing environmental and infrastructure constraints

The above objective will score positively in relation to Sustainability Objective 2, albeit it is acknowledged in the Plan that the town cannot meet all of its objectively assessed housing needs due to environment and local infrastructure constraints. Other SA testing objectives would be met positively though, including those relating to protection of open spaces. The objective, by focusing on new homes only, may mean that it doesn't score very well in relation to provision of employment, retail and other uses which may be seen as 'competing' land uses.

Plan Objective 5): To promote development that will provide sustainable economic growth and maintain a prosperous town centre

This sustainable economic growth objective would be positively received in relation to the SA objectives relating to employment growth and enhancement of the town centre. However, the objective does not specifically refer to protection of open spaces and rural areas and as such may be deemed negative in relation to these testing objectives. That said, the objective seeks a balanced and pragmatic approach to growth which has due regard to wider sustainability issues.

Plan Objective 6): To protect the countryside and urban open spaces for their landscape, wildlife, agricultural, recreational and natural resource value

This objective scores very highly in relation to the first SA objective and those protecting green spaces, and the Ashdown Forest. It does not assist in delivering retail, employment and other uses and so scores negatively when assessed against these testing objectives. The objective would have a limited impact on those testing objectives related to co2 emissions and movement generally.

5 TESTING OF THE NEIGHBOURHOOD PLAN POLICIES

- 5.1 A key part of Sustainability Appraisal is the diligent consideration of alternative approaches (the 'review of alternatives') so that the effects/impacts on different material considerations and options can be fully understood. This involved appraising alternative strategies for each of the development management and site-specific policies to fully understand the implications of each. This is also subject to the 'traffic light' methodology outlined above.
- 5.2 In order to do so and provide a consistent level of assessment a detailed proforma was designed to test the performance of the policy against the established sustainability appraisal. Each policy was subsequently tested.
- 5.3 The proformas for each policy are included overleaf, together with a commentary setting out the 'testing rationale', together with a consideration of the implications of alternative solutions.

Policy EG1 – Protection of the High Weald AONB

Policy States:

'Within the High Weald Area of Outstanding Natural Beauty planning permission will be refused for major development proposals unless the development is demonstrably required in the public interest and meets the exceptional circumstances criteria outlined in the NPPF.

Planning permission for other forms of development will be granted where the proposals are for the:

- (i) Conversion of redundant buildings;
- (ii) Replacement, on a like for like basis, of existing buildings; or
- (iii) Extension of an existing dwelling house, relate to agricultural development or some other minor recreational use;

Provided that for each of the above (i, ii and iii) all of the following criteria are met:

- The highest standards of Design are achieved;
- The natural and scenic beauty of the landscape is conserved or enhanced;
- The proposals do not result in an obtrusive feature in the landscape.

The onus is on the applicant to demonstrate that the scheme would not negatively impact on the existing quality of the protected landscape and its setting taking account of locally important features. Proposals that have not fully considered and addressed the impact on the AONB will normally be refused.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
++	-	+	0	0	++	0	-	0	0	0

Commentary

Policy EG1 scores very well against sustainability objectives 1 and 6. Objective 1 seeks to preserve the nationally important AONB and non-designated countryside landscape and to protect it from development pressures. Sustainability objective 6 also seeks to preserve open countryside for the purposes of general enjoyment and therefore Policy EG1 scores well in this regard.

Sustainability objective 3 seeks to protect the amenities of the resident population, which includes maintaining their ability to enjoy open countryside and to preserve the setting of the town. Policy EG1 therefore provides a positive impact in this respect.

In respect of negative assessments, Policy EG1 seeks to seriously prohibit major new housing and business growth within AONB areas and therefore it is in conflict with objectives 2 and 8 that seek to deliver new development of these types.

Negative scores are not attributed to objectives 4, 9, 10, or 11 as although these support development, they relate to town centres not affected by the extent of policy EG1.

The policy has a limited impact on co2 emissions and has therefore been scored neutrally.

Assessment of Reasonable Alternative Approaches

In respect of alternatives, national planning policy governs that AONBs should be protected for their landscape value. In view of this it is not feasible to adopt an alternative more pro-development based policy that would support the introduction of housing, employment and other commercial uses, other than small scale rural enterprise uses and open recreation. Likewise, the policy seeks only to ensure that a localized approach to development is adopted. The assessment below indicates that an alternative approach is unlikely to be sustainable.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
--	+	0	-	-	--	-	0	-	-	0

Opportunities to Mitigate Negative Effects

None

Policy EG2 – Areas of Development Constraint

Policy States:

‘Planning permission will not normally be granted for development within the Countryside Areas of Development Constraint which:

- (1) Results in the coalescence of East Grinstead with Crawley Down or Ashurst Wood;
- (2) Results in the perception of openness being unacceptably eroded within this area
- (3) Contributes towards the ad hoc or isolated development of dwellings outside the built up area, including infilling of built up frontages or linear development along roads.

Planning permission will normally be granted for the sympathetic conversion of redundant rural buildings, limited small scale new development and extensions to existing buildings provided they comply with the following criteria:

- (1) In the case of replacement dwellings, the proposal is no more obtrusive than the dwelling it replaces and is of an appropriate design for its location and setting;
- (2) In the case of extensions, the proposal is subservient in scale and form to the original dwelling along with the coherent use of materials;
- (3) In the case of converted buildings, the new use has minimal impact on the openness of the countryside, in terms of the new curtilage, and parking; in the case of outdoor sport, recreation and community uses of land, the proposals support the objective of keeping land open;
- (4) Essential small-scale proposals for agricultural or sport and recreation such as pavilions and changing rooms; and
- (5) It is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.’

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
++	+	+	+	0	+	+	+	+	+	+

Commentary

This policy scores well against most objectives. It scores highly in relation to objective 1 because the policy is designed to maintain and restrict development in the countryside and so is consistent with the framework objective. The policy also scores well in relation to objective 2 since it will encourage those in housing need within East Grinstead to continue to dwell within the town, close to existing facilities. The framework objective 3 seeks to protect amenities and the policy is consistent with this protection objective, particularly in the context of protecting countryside amenities. Framework objective 4 requires new development to complement the town character, and the policy positively underpins this sustainability criteria.

The policy will prevent most sizeable development in the countryside, which might cause emissions (strategic framework 5) but because small-scale development is permissible some modest emissions might occur. It has therefore been scored neutrally.

The Areas of Development Constraint policy generally seeks to restrict development within the countryside and so a positive impact is considered in relation to objective 6.

The policy will assist in maintaining a compact settlement and this will help reduce the need to travel by car, improve accessibility and encourage a greater mix of uses and employment within East Grinstead. (Framework criteria 7 and 9) This will result in a positive affect.

The policy places restrictions on development within Areas of Development Constraint so employment opportunities may therefore be reduced. However, objective 8 is also related to sustainable tourism and this policy is likely to have a positive impact on visitors. Overall, therefore, the policy has been scored neutrally.

Objectives 10 and 11 seek to introduce retail and mixed uses into the town centre. This policy would deter out of town development and so can be considered to be positive in relation to these objectives.

Assessment of Reasonable Alternative Approaches

Countryside Areas of Development Constraint have historically been used to maintain the setting, context, character and individual identity of towns that might otherwise be threatened by coalescence (unrestrained growth resulting in the merging of settlements) – in this instance, East Grinstead with Crawley Down and Copthorne.

An alternative strategy would be to remove the policy and to meet development needs within the countryside. However, this would adversely impact on the Ashdown Forest and because of the close relationship of East Grinstead with Crawley Down and Copthorne would harm the character, setting and independence of those settlements. This approach would have the effect of introducing development mainly on greenfield sites and in isolated and edge of settlement locations. The strategy would undermine the principles of sustainability.

Another alternative would be to remove the policy and rely instead on countryside protection policies. This would result in a level of restraint for new development but would weaken the overall objective of only allowing growth within the settlement and would potentially lead to the incremental erosion of settlement context, setting and character. The assessment below indicates that the alternative approach would not be sustainable.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
--	+	0	--	-	--	-	0	-	-	0

Opportunities to Mitigate Negative Effects

None

Policy EG3 – Promoting Good Design

Policy States:

‘Planning permission will normally be granted where development proposals meet the following criteria:

- a) The form of the proposed development is proportionate and in keeping with the scale, height, materials and site coverage of the surrounding area;
- b) The layout of the proposed development respects the topography and character of the site, protects important landscape features and does not harm adjoining amenity;
- c) The proposal does not result in the loss of buildings or spaces that would have an unacceptable impact on the character of the area;
- d) The proposal ensures satisfactory means of access for vehicles and pedestrians and provides adequate parking, cycle storage and refuse facilities on site;
- e) The design of new buildings and the layout of spaces, including footways, car and cycle parking areas, should be permeable and provide connectivity with neighbouring areas;
- f) New development must be inclusive and where appropriate make satisfactory provision for the safe and easy access for those with mobility impairment; and
- g) The design of new developments must result in the creation of a safe and secure environment and incorporate adequate security measures and features to deter crime, fear of crime, disorder and anti-social behaviour; and
- h) Proposals make provision for green infrastructure and biodiversity enhancement.

Due to infrastructure constraints within the town, all new development proposals, which generate a net increase in traffic (excluding householder applications), will be required to contribute towards improving the walking and cycle network related to the development and be of a recognised acceptable standard.’

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	+	++	+	+	+	0	+	0	0

Commentary

This policy concerns itself with good design and so has a positive affect on a variety of framework objectives. The policy will help achieve a more sustainable design for all buildings (including houses and employment structures), improve amenity via controls over the built fabric, improves design and so helps new development integrate with the town’s character, will help protect and maintain important green spaces, and assist with creating permeable environments. It also encourages cycle parking and connectivity by foot, which is a positive affect in relation to framework objectives 5 and 7.

In relation to framework criteria 1, 8, 10 and 11 the affect is considered neutral since the policy focuses on design quality and would have no effect on maintaining the AONB, areas of countryside constraint, opportunities for employment, retail and other uses.

Assessment of Reasonable Alternative Approaches

Policies promoting high standards of design are a longstanding approach within development plan documents and are strongly advocated within the NPPF. A reasonable alternative could be to develop design codes for the town instead of plan policies, but this would weaken the Council’s ability to support a variety of design approaches and would potentially limit the creative flare of the design professions. The following indicates that the alternative would produce a less sustainable policy.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	0	--	-	-	-	0	-	-	-

Opportunities to Mitigate Negative Effects

The policy is specific to design and not concerned with land use matters that are the subject of other policies. Consequently there are no reasons to consider mitigation.

Policy EG 4 – Heritage Assets

Policy States:

'Proposals that relate to a Listed Building/Structure, Conservation Area or any other designated Heritage Asset will only be permitted where all of the following criteria are met:

- a) The proposal leads to less than substantial harm in relation to the significance of the heritage asset;
- b) Where harm is more than substantial, planning permission will be refused unless the harm is clearly outweighed by the benefits of bringing the asset into a viable, long term and managed use. Harm would include any significant detrimental effect on;
 - The architectural or historic attributes of the asset; and/or
 - The character and setting of the Heritage Asset; and views of the Heritage Asset.
- c) Proposals for development within The Portlands area of 58 to 84 High Street will be subject to rigorous assessment having regard to their character and appearance, historic importance and contribution to the Conservation Area.
- d) A suitable heritage statement and/or archaeological assessment must be provided in support of the proposals.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	0	+	++	0	+	0	0	0	0	0

Commentary

Since one of the Conservation Areas is outside the built up area the policy has a modest positive affect on the first framework objective.

The policy will have a positive affect on heritage assets and would also have a positive affect on maintaining and improving amenities such as open space. There is likely to be a very positive effect on the character of the town and so the policy will result in a positive impact on framework objectives 3, 4 and 6.

In relation to framework objective 2, the policy would have a neutral impact since that objective is concerned with meeting sustainable and appropriate housing needs. Framework objective 5 is concerned with climate change and transport that is unrelated to this particular heritage policy. Consequently, the affect is neutral. Framework objective 7 to 11 inclusive is also unrelated to the Heritage Asset policy and so there is a neutral affect – the policy would not have any bearing on the provision of employment, retail or other uses.

Assessment of Reasonable Alternative Approaches

Conservation Areas and Listed Buildings have statutory protection. There is, therefore, little scope to consider a reasonable alternative to having a heritage asset policy. Government policy in NPPF requires development plan policies to address these issues and to provide the framework to protect nationally and locally important heritage assets.

If the policy were removed or the criteria relaxed to permit a wider range of development then the following assessment would be relevant. Objective 11 is positive since development could be expected to take place within the Conservation Areas and this would meet the objective 11 test.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	0	0	--	0	-	0	0	-	0	+

Opportunities to Mitigate Negative Effects

It may be the case that heritage status prevents otherwise acceptable development. In this case, however, the policy includes the test of significance of the asset when weighing up any harm that a proposed development might cause.

Policy EG5 – Housing , Policy EG6A and Policy EB6B

Policy States:

'New housing development will only be supported if it complies with each of the following criteria:

- a) The site is located within the existing settlement boundary;*
- b) The land is either defined as 'previously developed,' where the site is predominantly previously developed or is green infrastructure but can be demonstrated to be surplus to requirements;*
- c) The proposal complies with design guidance contained in policy EG3 or a relevant Development Brief;*
- d) The proposals provide a mix of tenure types including private, social rented and shared equity (intermediate);*
- e) Does not cause a severe cumulative impact in terms of road safety and increased congestion after proposed mitigation is taken into account;*
- f) Contributions are made towards SANG and Strategic Access Management and Monitoring (SAMM); and*
- g) The proposal meets its own infrastructure needs.*

Where proposals comply with Policy EG5, relevant site-specific policies and mitigate their highway and other infrastructure impacts, the following sites (EG6A and EG6B) will be encouraged to come forward for residential development.

Policy EG6A – Housing Sites that are committed via planning permissions

- 1. St Lukes House and St Lukes Church, Holtye Avenue (0.14ha, SHLAA ref 439). This site has been previously promoted for development but proposals will need to justify the loss of this piece of community infrastructure. A development similar in scale to the new apartments opposite could be developed. Development should not exceed three storeys and two storeys near adjoining houses. A suitable soft landscaping and boundary treatment, consisting of native species, will be required along the southern boundary to provide appropriate screening in order to protect neighbouring residential amenity. The site could achieve up to 15 units and permission was granted under 12/00439/FUL for 14 units.*
- 2. 1-25 Bell Hammer (0.35ha, SHLAA ref 696). This site has an extant planning permission (13/01343/FUL for 28 sheltered housing units but could be suitable for housing.*
- 3. Warrenside, College Lane (0.17ha, SHLAA ref 444). An existing dwelling adjacent to Beeching Way. Scope exists for 14 units subject to important trees being protected and the amenity of residents adjoining the site. Outline permission granted 12/01877/OUT.*

Policy EG6B – Housing Sites which could be brought forward include:

- 4. Meadway Garage, Lowdells Lane (0.16ha, SHLAA ref 324). This site has some tree coverage but historically was used as a garage. It is now redundant and dilapidated. To conform to the character of the area some 9 dwellings is considered appropriate in two storey buildings.*
- 5. Land at junction of Windmill Lane and London Road (0.4ha, SHLAA ref 102). This site is on a prominent corner where a flatted scheme would be appropriate. The scale of the development should not exceed 3 storeys in height and frontage trees of significance should be retained. This site could achieve 30-35 dwellings and is identified in the Small-scale Housing Allocation Document (SSH/2).*
- 6. Imberhome Lane Car park (0.18ha, SHLAA ref 510). The redevelopment of this site is subject to evidence being submitted that the car park is no longer needed. A flatted scheme providing up to 18 dwellings would be suitable. Two storey buildings would be an appropriate scale of development, although if a higher scale building were proposed a visual and amenity impact assessment would be required.*
- 7. 67-69 Railway Approach (0.09ha, SHLAA ref 441). This site is subject to a site specific Policy SS1. It could accommodate up to 7 units.*

8. *Post Office and delivery office, 76 London Road (0.15ha, SHLAA ref 559). This is a listed building with a much later extension and service yard at the rear. Development for up to 12 dwellings would be supported subject to (i) a ground floor retail use on the London Road frontage and (ii) the removal of the rear brick extension which detracts from the listed frontage.*
9. *Cantelupe House, Cantelupe Road (SHLAA ref 608) An older 1960's office building of limited architectural merit. Close to existing residential units. Given its elevated position a maximum of 3-Storeys would be appropriate. Designs should reflect the Victorian character of the residential street. The number of units could be 10-12 depending on design.*
10. *Imberhome Lower School, Windmill Lane (7ha, SHLAA ref 81). This site is subject to Policy SS3. Subject to Policy EG5 relating to highway infrastructure mitigation, the site could accommodate circa 200 dwellings. Prior to planning permission being granted a development brief should be prepared, consulted upon and adopted. The Town Council, with stakeholders, proposes to take a lead on its preparation.*
11. *Ashplats House, off Holtye Road. This site would be suitable for between 35 and 45 dwellings being that it is now surrounded on 3 sides by existing development and partly constitutes previously developed land. Access Could be appropriate off Greenhurst Drive.*
12. *Queens Walk between Queensway and London Road. This site is subject to pre-application discussion and the owners have confirmed their intention to deliver a mixed-use scheme. The site could achieve up to 120 dwellings subject to design and mix use considerations.'*

EG5 - Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	+	+	+	+

Commentary

The policy requires development to be located within the settlement on green infrastructure of surplus to requirements or on previously developed land which is wholly consistent with framework objective 1 and a very positive impact since it is a sustainable form of development.

Sustainability framework objective 2 relates to providing for housing need in the town and the policy would result in a very positive impact.

Objective 3 is concerned with maintaining/improving amenities. New housing can result in pressure on existing facilities. The policy cross refers to the design policy and so would ensure that any new housing development integrates well with the character of the town and its conservation area.

Housing development will result in a negative impact in relation to objective 5 as new housing development will add pressure to roads, and infrastructure and generate co2-emitting traffic.

Framework objective 6 seeks to protect green spaces and minimize adverse impacts on the Ashdown Forest. New housing development will impose some additional pressure on these resources which is a negative impact but this will be counterbalanced by the policies focus on developing only previously developed sites thus protecting green spaces. A neutral assessment has therefore been made.

Housing development will generate car journeys and this will be a negative impact in relation to objective 7.

Framework objectives 8 to 10 (inclusive) relate to specific land use matters such as employment, accessibility and retail. At one level the sites identified could be allocated for alternative uses such as retail, employment and community uses. However, this would result in a dispersed pattern of traffic generating development not considered appropriate. The new housing will mainly be located within existing central residential neighbourhoods. In view of this the introduction of new homes in these locations is generally complementary and will help to sustain other uses by providing the labour force with a place to live in proximity to the town centre and centres of employment and will, therefore, support the greater use of public transport and retail expenditure. The policy is not specifically designed to meet these objectives but the sustainability benefits are positive.

The policy would result in a positive impact in relation to objective 11 because the objective seeks a greater mix of uses including more affordable housing.

EG5 - Assessment of Reasonable Alternative Approaches

The policy limits the amount of new development to specific locations within the built up area and on previously developed sites. This limits the amount of housing development. The alternative to this policy is to allow housing development beyond the boundary of the settlement on a Greenfield site by allocating other land. Such an alternative would need to be of a scale and form which allows other objectives in the plan to be met, for example, by providing a mix of uses, links to the settlement, public transport links, additional retail and employment. This would conflict dramatically with the AONB and countryside restraint policies and potentially encourage further unsustainable car use and THE coalescence of settlements. It could also bring development closer to Ashdown Forest that would harm its SPA and SAC status. This is reviewed below.

Development could be undertaken without complying with the six criteria set out within Policy EG5. Such an un-managed approach to growth would conflict with other policies of the plan on, for example, design, housing mix, countryside protection, and so on and would, equally, conflict with the strategic aims of the NPPF.

EG5 - Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
--	-	0	+	-	--	-	+	-	-	+

Opportunities to Mitigate Negative Effects

Given the environmental constraints of Ashdown Forest, imposed by the European Habitat Regulations, and the physical limitations of highway infrastructure within the town, much of which is demonstrably working at or over capacity, it is not appropriate to change the policy. The implications are too great and cannot readily be mitigated.

EG6A - Assessment against Sustainability Framework (St Lukes Church/House)

1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	+	+	+	+

EG6A - Assessment against Sustainability Framework (Bell Hammer)

1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	+	+	+	+

EG6A - Assessment against Sustainability Framework (Warrenside)

1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	+	+	+	+

Commentary

The policy identifies three sites that are committed via planning permissions and which are to be built. The above assessment identifies the sustainability merits of retaining these sites as they are allocated under policy.

EG6A - Assessment of Reasonable Alternative Approaches

The three sites could be allocated for alternative uses which would result in a loss of the social benefits of providing new housing. Commercial or retail/built leisure uses could be introduced on these sites but, in all cases, the location would not be appropriate to a more sustainable approach to development. The three sites are modest in scale, which limits opportunities for viable alternative uses. These concerns are reflected in the assessments below, which because of the loss of housing, yield similar results.

EG6A - Assessment of Reasonable Alternative against Sustainability Framework (St Lukes Church/House)

1	2	3	4	5	6	7	8	9	10	11
0	--	0	-	-	0	-	+	-	-	0

EG6A - Assessment of Reasonable Alternative against Sustainability Framework (Bell Hammer)										
1	2	3	4	5	6	7	8	9	10	11
0	--	0	-	-	0	-	+	-	-	0
EG6A - Assessment of Reasonable Alternative against Sustainability Framework (Warrenside)										
1	2	3	4	5	6	7	8	9	10	11
0	--	0	-	-	0	-	+	-	-	0
Opportunities to Mitigate Negative Effects										
Given the need for housing it would be inappropriate to consider alternative land uses since the housing need may have to be delivered on sites outside the settlement boundary.										

EG6B - Assessment against Sustainability Framework (Meadway Garage)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	+	0	+
EG6A - Assessment against Sustainability Framework (Jnc of Windmill Lane and London Road)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	0	+	0	+
EG6A - Assessment against Sustainability Framework (Imberhorne Lane Car Park)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	+	0	+
EG6A - Assessment against Sustainability Framework (67-69 Railway Approach)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	+	+	+	+	+
EG6A - Assessment against Sustainability Framework (Post Office site)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	+	-	+
EG6A - Assessment against Sustainability Framework (Cantelupe House)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	--	+	+	+
EG6A - Assessment against Sustainability Framework (Imberhorne Lower School)										
SEE POLICY SS3										
EG6A - Assessment against Sustainability Framework (Ashplats House)										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	-	+	+

Commentary										
<p>The policy requires development to be located within the settlement on previously developed land, which is wholly consistent with framework objective 1. It is an inherently sustainable approach to development, which conveys a positive impact and is consistent with provisions of the NPPF.</p> <p>Sustainability framework objective 2 relates to providing for housing need in the town. The policy makes provision for housing is sustainable locations and, consequently, generates a very positive impact.</p> <p>Objective 3 is concerned with maintaining/improving amenities. New housing will place pressure on existing facilities. The policy cross refers to the design policy and so would ensure that any new housing development integrates well with the character of the town and its conservation area.</p>										

Housing development will result in a negative impact in relation to objective 5 as new housing development will invariably add pressure to roads and infrastructure and will generate co2-emitting traffic. The impact is minimised though, as the identified sites lie within the central confines of East Grinstead – a tier 1 settlement.

Framework objective 6 seeks to protect green spaces and minimize adverse impacts on the Ashdown Forest. New housing development will impose some additional pressure on these resources which is a negative impact but this will be counterbalanced by the policies focus on developing only previously developed sites thus protecting green spaces. A neutral assessment has therefore been made.

Housing development will generate car journeys and this will be a negative impact in relation to objective 7, although again, the impacts are minimized due to the sustainable and locational advantages of the sites.

Framework objectives 8 to 10 inclusive relate to specific land use matters such as employment, accessibility and retail. For some of the sites this results in a negative score, for example where employment is being lost for new housing. However, this would result in a dispersed pattern of traffic generating development not considered appropriate. The new housing is predominantly within existing neighbourhoods and will help underpin other uses by providing workers with somewhere to live, greater use of public transport and retail expenditure, the policy is not specifically designed to meet these objectives but the sustainability benefits are positive.

The policy would result in a positive impact in relation to objective 11 because the objective seeks a greater mix of uses including more affordable housing.

EG6B - Assessment of Reasonable Alternative Approaches

Each of the sites has been assessed against the possibility of a different land use being allocated as alternatives to the provision of new homes. Given the urban and suburban context of the sites, the variety of land uses that could be allocated instead is many. Consequently, the assessment assumes a commercial type of use including employment, retail or built leisure since these are the most likely uses that would be consistent with an urban/suburban context. The policy would limit the amount of new development to specific locations within the built up area and on previously developed sites. The use of the sites for alternatives, would limit the amount of land available to help meet housing need.

In the majority of cases (Sites 1 – 9 inclusive) the identified sites are not large enough to be viable for alternative forms of employment, retail and built leisure uses. Sites 10 and 11, Imberhorne School and Ashplats House, respectively are larger. In the case of the latter, it is located on the eastern edge of the settlement and is immediately surrounded on three sides by a recently completed residential development. The location of the site, its size and immediate proximity to family housing mitigate against alternative uses.

Imberhorne School is a large, flat, centrally located parcel of land that could benefit from alternative retail, employment or recreational uses. However, the site and its immediate surroundings are constrained and there is a history of access difficulties. The established employment centres of Birches and Charlwoods lie close by to the west and south east respectively. Employment facilities would be better directed to these centres – particularly Birches, which has better access and is of a high standard.

The School site is completely surrounded by established housing. A limited number of new homes, would therefore complement and reinforce the established character. New residents would benefit from the exiting public recreation ground that adjoins the site to the east.

A more strategic alternative to this policy would be to allow housing development beyond the boundary of the settlement by allocating Greenfield land. Such an alternative would need to be of a scale and form which allows other objectives in the plan to be met, for example, by providing a mix of uses, links to the settlement, public transport links, additional retail and employment. This would conflict dramatically with AONB and countryside policies and potentially encourage further car use and coalescence of settlements. It could also bring development closer to Ashdown Forest that would harm its SPA and SAC status. This is reviewed below.

EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Meadway Garage)

1	2	3	4	5	6	7	8	9	10	11
-	-	0	0	-	-	-	+	-	-	-

EG6B - Assessment of Reasonable Alternative against Sustainability Framework (jnc of Windmill Lane and London Road)										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	+	-	-	-	+	-	-	+
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Imberhorne Lane Car Park)										
1	2	3	4	5	6	7	8	9	10	11
-	-	-	+	-	-	-	+	-	-	+
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (67-69 Railway Approach)										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	+	-	-	-	+	-	-	+
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Post Office site)										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	+	-	-	-	+	+	+	-
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Cantelupe House)										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	+	-	-	-	+	-	+	+
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Imberhorne Lower School)										
SEE POLICY SS3										
EG6B - Assessment of Reasonable Alternative against Sustainability Framework (Ashplats House)										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	+	-	-	-	+	-	-	+
Opportunities to Mitigate Negative Effects										
Given the need for housing it would be inappropriate to consider alternative land uses since the housing need may have to be delivered on sites outside the settlement boundary.										

Policy EG 7 – Housing Mix and Density										
Policy States:										
<i>'Planning permission will be granted for new housing schemes where they meet the following criteria:</i>										
<ul style="list-style-type: none"> (1) <i>Achieve a minimum density of 30 dwellings per hectare unless local character indicates a different density level and this justification is provided;</i> (2) <i>On sites of 5 or more dwellings, provide a minimum of 20% small family accommodation in the form of 2 and 3 bedroom units;</i> (3) <i>Variations in the above mix will only be considered where a viability assessment has been provided to justify a departure from this policy or there are clear design and location reasons which indicate a higher density is appropriate; and</i> (4) <i>Provides affordable housing in accordance with District policy.</i> 										
Assessment against Sustainability Framework										
1	2	3	4	5	6	7	8	9	10	11
+	+	-	+	-	0	+	0	+	0	+

Commentary

By ensuring that developments make efficient use of land the policy scores well against objective 1 and 2 - it would relieve pressure to release further land for development in the countryside and AONB and provide opportunities to live centrally and sustainably within the town. The policy would only entertain low density or high density where certain justification is provided.

New housing could result in pressure placed upon existing amenities which may result in a negative impact.

The policy provides scope for density and mixes to reflect local character and so would ensure a positive impact in relation to objective 4.

New development could add to emissions from transport and so the policy, by including density criteria, may result in higher levels of pollution under certain circumstances. A negative response is appropriate against objective 5.

In relation to objectives 6, 8 and 10 the policy would have no real affect on the objectives. Mix and density policy does not presuppose that green spaces will be eroded and neither does the policy have any affects on employment opportunities or retail.

The policy could have positive affects in relation to objective 7 since a minimum density enables enhanced use of existing infrastructure within the settlement. A good mix and better use of development land could assist with movement and permeability within the settlement and create a mix of residential uses.

Assessment of Reasonable Alternative Approaches

The policy has a minimum density as a starting point but provides for flexibility on the fulfillment of certain conditions such as addressing the surrounding and prevailing character of the site. Subject to meeting the criteria the policy makes provision for an alternative density threshold. This flexibility indicates that alternative policy approaches are not necessary.

This policy is seeking to redress the balance of the type and size of housing being built on larger sites in East Grinstead by specifying a requirement for small family accommodation to come forward. The alternative is to let the market decide completely and not to specifically target this type of property/accommodation. However, this could lead to a shortfall of smaller family accommodation in the future or development, which is out of character.

In circumstances where a viability assessment can justify a departure from policy, variations in the above mix will be considered. This policy therefore builds in flexibility where necessary. If the policy removed density controls then the following assessment would be relevant.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	-	--	0	-	+	0	-	0	-

Opportunities to Mitigate Negative Effects

There will be a need to consider whether low or high-density schemes result in negative effects such as inefficient use of land or negative amenity impacts.

Policy EG8 – East Grinstead Town Centre

Policy States:

‘Planning permission for changes of use of ground floor shop type units within the Town Centre will be permitted subject to the following criteria being met:

- a) The retention of a shop window display;*
- b) The use falls within the A1 to A5 use classes, D2 and other cultural/arts and community type uses or uses which enhance the vitality and viability of the Town Centre;*

Proposals that seek to amalgamate small units into larger units will generally be resisted because they would be contrary to the small shop unit character of the Town Centre. However in exceptional circumstances, where the proposals result in a qualitative benefit to the Town Centre, such amalgamations will be permitted if the shop front design presents the perception of small shop units.

Planning permission for changes of use to residential or office uses will be permitted on upper floors within the Town Centre provided that the residential unit size created complies with the Technical Housing Standards published by Department for Communities and Local Government, March 2015.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	+	++	++	0	++	+	++	+	+

Commentary

The policy allows for a degree of flexibility in the type of use that could move into the town centre by allowing residential or office uses on upper floors. It therefore scores well in relation to objectives 2, 3, 8 and 11.

The policy focuses on existing smaller shop units, the design of these in relation to the town centre and a ground floor active frontage type use. The policy therefore scores very well in relation to objectives 4.

The policy also scores very well in relation to objectives 5, 7 and 9 as it seeks to promote and enhance the town centre, thereby reducing journeys elsewhere.

The policy primarily focuses on how existing retail units should be used in the Town Centre. In particular, there is the potential to improve Queen’s Walk, a small pedestrianised shopping mall located on the west side of London Road. Site Specific Policy SS2 seeks the comprehensive redevelopment of this mall, which will enhance the amount of shopping provision. This policy is likely to improve the quality and offer of the shopping experience and therefore scores positively in relation to objective 10.

The policy does not specifically refer to rural areas or green spaces and as such has been scored neutrally in relation to objectives 1 and 6.

Assessment of Reasonable Alternative Approaches

The policy could allow the market to decide where non-retail uses should go and how they should be designed. The policy provides no guidance for new retail and town centre uses outside of existing ground floor shop type units. A reasonable alternative approach could be to set a policy for the consideration of proposals for main town centre uses that cannot be accommodated in or adjacent to the town centre.

Once such policy could be to allocate land for retail development on greenfield sites within or close to the settlement boundary. However, this would not be sustainable and weaken the overall objective of retaining the main A1 – A5 uses, together with D2 and similar uses, in the centre of the town to provide ease of access and to support the vitality and viability of the “centre”. The following assesses these options.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	0	+	--	-	0	-	+	-	-	0

Opportunities to Mitigate Negative Effects

Development on greenfield sites within the settlement would conflict with the objective that seeks to protect and enhance green spaces. Outside the settlement boundary new development would conflict with the Ashdown Forest policy and AONB.

In circumstances where retail development is being sought outside of the town centre, reliance on national retail policies (in the form of sequential and impact testing) should be applied.

The unmanaged dispersal of retail, entertainment, restaurant and related uses outside the “centre” would impact on its viability and lead to additional and unsustainable trip generations.

Policy EG9 – Temporary Community Uses

Policy States:

'Within the town centre of East Grinstead the temporary use of long term vacant commercial and retail premises will be permitted where they would provide a community based use compatible with the wider surroundings and would not impact upon the amenities of neighbouring properties or impinge upon the attractiveness of the town centre.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	0	+	+	+	0	+	+	+	-	++

Commentary

By focusing community uses within the Town Centre, less pressure may be placed on finding community use sites outside of the built up area and so there would be a positive impact in relation to objective 1.

Objective 2 and 6 are not considered relevant as they relate to housing and open spaces and so a neutral affect will be applied.

Residential amenities will be positively enhanced by the policy, albeit there is an emphasis on short-term use (objective 3).

The policy includes considerations of character and attractiveness and so the policy is positive in relation to objective 4.

Objectives 5, 7 and 9 – relate to a centralized location for community uses which may assist in encouraging access by walking or public transport and also reduce the reliance on the motor car. The locational aspects of the policy would yield a positive impact.

Community uses may yield some negligible positive impacts on sustainable tourism/employment and the policy is likely to yield a positive impact in relation to objective 8.

In the long term the community use policy could result in the loss of retail units and this would be a negative impact in relation to objective 10.

The policy will encourage a much greater mix of uses and so have a very positive impact in relation to objective 11.

Assessment of Reasonable Alternative Approaches

A reasonable alternative would be to allocate specific sites for community uses throughout the Plan area. However, such is the changing requirement/need and location for community based infrastructure, long term future planning is difficult to undertake. It could also result in community development in inappropriate locations and instead of other important land uses such as housing or open space. Consequently, where space exists within a highly accessible town centre the policy encourages new uses.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	-	+	--	-	-	-	+	-	-	0

Opportunities to Mitigate Negative Effects

Community uses and development are encouraged within NPPF.

Policy EG10 – Employment Provision

Policy States:

“Planning permission will be granted for the redevelopment, extension or alteration of existing B use category business premises. Applications will be granted where they:

- (1) Are on a site defined as previously developed land;*
- (2) Meet the parking requirements of the adopted Development Plan;*
- (3) Provide a high quality landscape setting;*
- (4) Do not result in any adverse impacts on the local highway network after mitigation is taken into account;*
- (5) Meet their own infrastructure needs; and*
- (6) Are in a location and of a scale, form and design which is in character with its surroundings.*

Proposals for mixed-use redevelopment of ‘previously developed’ business sites will be permitted providing the proposal includes a qualitative enhancement in the business floorspace being provided.

The loss of lawful business premises and sites within the existing settlement confines will be generally resisted. Planning permission will only be granted if it can be demonstrated that the site has been unsuccessfully marketed for employment/business re-use for a period of at least 6 months; the building is unsuitable or unviable for continued business use; there is no reasonable prospect of the take up or continued use for business use at the site/premises in the longer term; and the proposal meets other policies of the Development Plan.’

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	+	+	+	-	+	+	++	+	+	+

Commentary

The policy scores very well against objective 8 as it supports new employment development.

The policy focuses on previously developed land and existing business sites and the implication is that it scores well against objective 1 and 6.

The policy is not directly related to improvements in accessibility (objectives 7 and 9), but the general thrust of the policy is to seek development within the settlement on previously developed land and so is positive in relation to these objectives.

Objectives 2, 3, 6, 10 and 11 are related to housing, retail and other uses. Whilst the policy seeks to resist the loss of lawful business premises, there is scope for redevelopment for other uses to come forward on older sites, less suited to meet modern office requirements. The affect is therefore positive.

The policy cross-refers to other plan policies including design policies. Consequently, the policy has a positive impact on 4.

The policy may have a negative impact on climate change due to its encouragement for redevelopment, extension and alteration of existing B use category business premises.

Assessment of Reasonable Alternative Approaches

An alternative policy approach could be to allocate land for employment development on greenfield sites within or close to the settlement boundary. However, this would not be sustainable given the policies of constraint; would be harmful to the visual and rural amenities of the countryside and edge of settlement character, lead to a dispersal of employment land uses and generate additional unsustainable traffic movements. This is represented in the assessment below.

Assessment of Reasonable Alternative against Sustainability Framework										
1	2	3	4	5	6	7	8	9	10	11
-	-	0	-	-	-	-	++	-	-	0
Opportunities to Mitigate Negative Effects										
<p>Development on greenfield sites within the settlement would conflict with the objective that seeks to protect and enhance green spaces and the quality and character of the urban/suburban environment.</p> <p>Outside the settlement boundary new development would be dispersed, which would lead to additional unsustainable traffic movements contrary to the long standing principles of sustainability and, moreover, would conflict with the Ashdown Forest policy and the aims of protecting the considerable visual and rural amenities of the AONB.</p>										

Policy EG11 – Mitigating Highway Impact

Policy States:

All new housing and business development proposals will be expected to:

1. *Include access arrangements that are appropriately designed and include adequate visibility splays;*
2. *Not materially harm the strategic flow of traffic through and within East Grinstead; and*
3. *Not cause a severe cumulative impact in terms of road safety and increased congestion and provides appropriate mitigation.*

Appropriate mitigation could be in the form of a zero car development, where justified in a transport assessment, travel plans, junction and highway improvements or contributions to the Highway Authority to carry out junction and highway improvements.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	+	0	0	-	0	0	0	-	-

Commentary

This policy is concerned with the affects on the local transport network rather than landscape quality and so objective 1 would not be relevant.

The policy might affect schemes coming forward for housing and business use, which would otherwise be acceptable if it wasn't for highway grounds. Arguably, this policy may reduce the amount of housing or business uses coming forward. Therefore objectives 2, 8, 10 and 11 have been scored negatively.

Objective 4 is concerned with testing the policy against its affect on character and heritage areas. The policy would be neutral in relation to this objective.

Objective 5, 7 and 9 are concerned with reducing the effects of traffic (congestion and pollution) whereas Policy EG10 accepts that development is permissible subject to meeting certain criteria. The policy could be seen as having a negative impact in relation to these objectives. However, the policy is also promoting appropriate mitigation measures such as zero car development so arguably it could score positively on objectives to minimise the impact on climate change and improve levels of accessibility by encouraging walking, cycling and use of public transport. Overall, therefore, these objectives have been scored neutrally.

The ability of the road network to serve local residents is one aspect of amenity and the policy seeks to mitigate any negative effects caused by traffic generation. The policy therefore scores positively in relation to objective 3.

The policy relates to housing and business development. Business development may potentially affect the Ashdown Forest, and hence objective 6 has been scored in a negative way.

Assessment of Reasonable Alternative Approaches

One alternative option would be to allow development irrespective of traffic impact. However, highway infrastructure is demonstrably at full capacity. A 'balance' must, therefore, be achieved between allowing development to meet identified needs and maintaining safe and useable roads. Consequently, it is necessary to grade the impact to identify an acceptable threshold. If development were allowed without regard to highway matters the following assessment would be relevant.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	0	-	-	--	-	--	-	--	0	0

Opportunities to Mitigate Negative Effects

Use of Travel Plans and encouraging use of alternatives to the car.

Policy EG12 - Car Parking

Policy States:

'Planning permission will only be granted where vehicle-parking provision, including cycle parking, is in accordance with West Sussex County Council adopted parking standards and it does not dominate the street scene.

In exceptional circumstances, a departure from the adopted standards will be supported if the applicant can demonstrate specific local circumstances require a different level of parking provision, including as a result of the development site's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems. For this to be accepted a Transport Assessment will be required together with a set of proposals to justify this alternative provision'.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	0	+	0	--	-	--	0	--	0	0

Commentary

The policy encourages car use through making provision for parking. Whilst car parking is a practical necessity of any new development, it scores poorly in relation to a number of objectives (5, 7 and 9) which are concerned with more sustainable modes of travel and mitigating impacts caused by car traffic.

Objective 6 is concerned with enhancing and making accessible green spaces and minimizing the affect on Ashdown Forest. The policy would be negatively scored since the provision of car parking would be detrimental to this objective.

On a positive note, objective 3 is concerned with the provision of necessary amenities, and residents consider adequate levels of car parking to be a necessary amenity.

Parking will be required for new housing, retail or employment developments. Objectives 2, 8, 10 and 11 are all therefore indirectly related to this policy. Arguably, this policy could restrict development coming forward because of the need to meet certain parking standards. However, the policy allows for a departure from adopted standards in exceptional circumstances. On this basis, a neutral score for these 4 objectives have been applied.

Objective 1 is unrelated to car parking matters which are the subject of this policy and so attracts a neutral score

Car parking is a facet of the town's character since most areas and developments benefit from parking provision. However, the policy is concerned with managing proposed car parking spaces rather than seeking compliance with design quality and so there is a neutral affect in relation to this objective.

Assessment of Reasonable Alternative Approaches

The policy allows for lower levels of parking than the adopted standards subject to justification through a Transport Assessment. The only alternative is zero car development. In central locations with access to facilities and major transport nodes this is a highly sustainable option. However, given car ownership levels in East Grinstead and the high demand to use cars this is an highly impractical solution that would promote high levels of un-managed and inappropriate vehicle parking that would lead to a cumulative reduction in environmental standards and highway safety. The policy makes provision for a balance to be struck.

If zero car parking/car developments were proposed then the following assessment would be relevant.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	-	-	++	-	++	-	0	-	0

Opportunities to Mitigate Negative Effects

Manage parking close to public transport hubs, and introduce travel plans. The Plan includes policies to this effect.

Policy EG13 – Embracing Modern Technology

Policy States:

'All new business and residential development will be required to include details of how the provision of modern technology interfaces, including broadband connection and other digital connections, can be incorporated into the development.

On major business and housing schemes, proposals will be expected to include measures such as solar generation, ground source heat pumps, and home electric charging points where practical.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	+	+	++	0	+	+	0	-	-

Commentary

The objective of this policy is to encourage infrastructure, which results in more sustainable living whether this be in promoting working from home or general day-to-day living. In this regard the policy has a positive impact in connection with most of the assessment objectives, particularly objective 5 seeking to minimise the impact on climate change.

Greater internet use could have a detrimental affect on shop-based retailing and may deter other uses from operating from the town centre if technology can be used as a substitute.

Objectives 1, 6 and 9 are not considered directly relevant and so the policy has a neutral impact on these assessment objectives.

Assessment of Reasonable Alternative Approaches

Modern technology, connections and energy saving devices are an integral part of modern society and whilst such technologies do not necessarily need planning permission, it is necessary to weigh in the balance proposals, which include them when making decisions. The reasonable alternative would be to not have such a policy but this would not be in the spirit of the presumption in favour of sustainable development (paragraph 14 of NPPF). If the policy were deleted or weakened then the following assessment would be relevant.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	-	0	-	0	-	-	-	0	0

Opportunities to Mitigate Negative Effects

No negative effects to mitigate.

Policy EG14 – Protection of Open Space

Policy States:

'Planning permission will be refused where development results in the loss of any publicly accessible open space, green spaces of visual amenity or other community assets unless the applicant can demonstrate that:

- a) The open space, green space or asset is surplus to requirements, is no longer necessary to meet an identified need and that there is no prospect of an appropriate alternative community, sports or recreational use being brought forward; or*
- b) The loss will be mitigated by equivalent or improved replacement provision (in terms of quality, quantity and accessibility elsewhere within the local area); or*
- c) The development proposed is for an ancillary use that will help maintain and improve the use and accessibility of the public open space.*

Where proposals are located on open space planning permission will only be granted if the ecological impacts are acceptable or that appropriate mitigation can be carried out.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	+	+	+	+	0	-	+	-	-

Commentary

Objective 1 relates to spaces around the town and so the policy results in a neutral score. Objective 6 seeks to protect sensitive green space. The policy seeks to do this but subject to them being needed. Consequently a positive score is applied.

The policy would assist in preserving the town's character and so objective 4 is positively met. Keeping open spaces and green areas free from development would support minimising co2 emissions and so objective 5 is met in a positive way. Green spaces within towns can also contribute to attractive pedestrian and other routes and so the policy would attract a positive score against objective 9. Amenities for local residents include green space therefore this policy has also been positively scored.

Objective 2, 8,10, and 11 could prevent housing, retail, employment and other uses from being built on green spaces within the town and so a negative assessment must be attached to these objectives.

Objective 7 is not considered to have any direct affect on the need to travel by particular modes and a neutral score has been given.

Assessment of Reasonable Alternative Approaches

The alternative to protecting green spaces subject to justification is not to protect them and be permissive towards new development, thus creating a compact settlement. However, the negative effects include the creation of poor quality living environments and more pressure for unsustainable out migration to access open spaces in the countryside, AONB and on Ashdown Forest. The following is the assessment of this.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	-	-	--	+	--	-	+	0	-	+

Opportunities to Mitigate Negative Effects

Retaining the town's character and protecting green spaces is an essential policy. Unless alternative green spaces can be found, there is no prospect of mitigation.

Policy EG15 – Sport, Recreation and Community Use Provision Policy

Policy States:

'The following sites are identified for children's equipped open space:

- *Estcot Estate, off Court Crescent; East Court off College Lane; Manor Glade; Heron Ghyll off Richmond Way; Newton Avenue; Sunnyside Recreation Ground; Lister Avenue; Pavilion Way off Dakins; Orchard Way; Copyhold Road; Brooklands Park Play Area; Imberhorne Lane; The Stennings; Lingfield Road; Mount Noddy Play Area; Kings Centre Play Area; King Georges Field Skate Park; Hollands Way; and East Court Estate off Estcots Drive.*

The following sites are identified for informal open space and play space:

- *Ashplats Wood; Land between Southlands and Dunnings Mill; Land between St Leonard's Park and Brooklands Park; Sackville Gardens, land at Mallard Place, East Court; Turners Hill Recreation Ground; and land at Spring Copse.*

Planning permission will only be granted for proposals that result in the loss of playing fields, allotments, community uses and other sports facilities where it can be demonstrated that they are surplus to requirements or alternative provision of the same quality and amount can be provided elsewhere.

Proposals to provide new and extended playing fields, allotments, cemetery, community use and other sports provision will be granted planning permission providing they do not result in any significant conflict with environmental and countryside policies.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	++	+	0	-	0	+	0	+	+

Commentary

The policy acknowledges that some facilities could be redeveloped if alternative provision were made or the facility was surplus to requirements. This would have a neutral impact on objective 1 whether or not replacement facilities were located outside the built up area since any uses would be open and largely undeveloped. Where development occurs then it could result in a positive impact if new housing is developed.

The policy seeks to protect community uses and existing sports pitch provision unless surplus to requirements or can be relocated and so is very positively scored in relation to objective 3. Only if these facilities are surplus to requirements would they be redeveloped but this would not be a negative impact since there would be no harm to this objective.

The town is characterised by sports pitch provision and community uses and as the policy seeks to protect sport, recreation and community uses, unless they are surplus or can be relocated there is generally a policy of restraint attracting a positive score for objective 4. Whilst development of surplus facilities could alter the character of the town the policy seeks replacement facilities or only allows the loss of surplus one so the effect would not alter the positive score attached. Objective relates to traffic emission impacts and it is often the case that existing leisure, community uses create traffic pollution and so would a new use. On balance the affect of redevelopment would neutral for objective 5. This policy is also scored negatively in relation to objective 6 – the policy is protectionist subject to criteria being met. Whilst replacement facilities would be a neutral affect the loss of those which are surplus to requirements would be negative.

The policy is neutral in respect of objectives 7 and 9. New development may well reduce journeys if, for example, housing is located close to existing facilities. That said, the relocation of a recreation or other resource may well encourage longer journey times. On balance objective 7 and 9 is neutrally scored. Objectives 8 and 10 refer to employment and retail which could be alternative uses if some uses were shown to be surplus to requirements were identified and so scored positively. Objective 11 refers to mixed uses and residential within the Town Centre. It is possible that relocating a community use could allow for such development and so be positively scored.

Assessment of Reasonable Alternative Approaches

The alternative would be to apply no protection to these areas of play space - this would result in land being susceptible to alternative land uses and development without adequate assessment of need. This could potentially have wider implications relating to the loss of play space, which is unsustainable in the context of social well being.

The provision of housing on these sites would help to meet housing demand, but would remove the existing amenity spaces and their enjoyment by the community. The additional population would add further unsustainable pressure for open space.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	-	-	-	-	-	-	-	-	0	0

Opportunities to Mitigate Negative Effects

None

Policy EG16 – Ashdown Forest Special Area of Conservation and Special Protection Area

Policy States:

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

- *contribute towards the enhancement and improvement of the Suitable Alternative Natural Greenspace (SANGs)*
- *contribute towards the Strategic Access Management and Monitoring (SAMM) Strategy.*

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	-	+	0	+	++	+	+	+	0	-

Commentary

The policy creates strict controls over the amount of new development and so will be positively scored in relation to the protection sought by objective 1.

It may be the case that the policy acts in a way that restricts new housing growth below the areas objectively assessed needs and consequently the policy scores negatively in relation to objective 2 and 11.

The policy focuses on protection of Ashdown Forest and so would help maintain rural amenities, which attracts a positive score in relation to objective 3.

The policy focuses on the way new housing development interacts with Ashdown Forest rather than affecting the way in which new development fits in with the character of the town and its town centre/conservation area. Consequently a neutral score is considered relevant in relation to objective 4.

Objective 5, 7 and 9 seek to minimize co2 emissions from transport and reduce the need to travel by car, which the policy would assist with since the operation of SANGS closer to the town would deter longer car journeys through and to Ashdown Forest and perhaps encourage walking and cycling.

Objective 6 is specific to the Ashdown Forest and so the policy provides the necessary high levels of protection expected by the objective.

The creation of a large SANG adjacent to East Grinstead might enable new employment opportunities to emerge linked to sustainable tourism and so a positive score in relation to objective 8 is appropriate.

Objective 10 is related to specific retail opportunities and a neutral score is relevant.

Assessment of Reasonable Alternative Approaches

The Habitat Regulations would apply whether or not a planning policy was in place and an Appropriate Assessment of schemes would be necessary. The Habitat Regulations make no provision for an alternative to the protection of a SAC and SPA. Consequently, the policy is considered necessary and appropriate. The assessment assumes no policy is in place and is an assessment of that and not the Habitat Regulations.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
-	-	-	--	-	--	-	-	0	0	0

Opportunities to Mitigate Negative Effects

None. The protection of Ashdown Forest is a high bar in terms of any assessment of new development even if the outcome is not to meet objectively assessed housing needs.

Policy SS1 – Railway Approach

Policy States:

‘Planning permission will be granted for the redevelopment of the site for a mixed use scheme providing the following criteria are met:

- (1) The ground floor should comprise predominantly A Class type uses along the Railway Approach frontage to encourage an active street scene;*
- (2) The upper floors and any development to the rear should comprise residential uses in the form of flats and apartments*
- (3) The development should, where possible, retain the existing building line and include proposals to enhance the pedestrian environment through new surfacing and landscaping.*
- (4) Development should not exceed three storeys unless a compelling case can be made via a visual and amenity impact assessment, which has regard to local character and context.*

Alternative mixes of uses, including leisure and community buildings will be considered where evidence is provided that they meet a particular need and would not cause harmful amenity impacts to nearby and proposed residential development.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	++	++	+	0	+	+	+	+	++

Commentary

The policy scores positively in relation to objectives 2, 3, 8, 10 and 11 because it promotes a mixture of uses, which will in turn improve amenities for local residents. The redevelopment of the site will also improve the townscape and hence a very positive score for objective 4 has been recorded.

The positive redevelopment of this area will also enable the creation of improved physical and visual links between the railway station and the town centre, creating a strategic ‘sense of arrival’ or gateway to the town: scoring highly against objectives 7 and 9.

Redevelopment will result in negative impacts on CO₂ emissions, however any new buildings will be much more energy efficient and therefore the impact overall on objective 5 is positive.

Framework objective 6 seeks to protect green spaces and minimize adverse impacts on the Ashdown Forest. New housing development will impose some additional pressure on these resources which is a negative impact. This will be counterbalanced by the policy’s focus on developing a previously developed site thus protecting green space. A neutral assessment has been made.

The policy does not impact the AONB so a neutral score has been provided.

Assessment of Reasonable Alternative Approaches

The alternative is to consider a single use housing development. A pure housing use is not considered appropriate given the suitability/character of the area for a mix of uses located between the town centre and railway station. Were commercial uses to be displaced in their entirety there would be a need for alternative locations for the commercial uses and this could be some distance away from the transport hub and so unsustainable. The following assesses the alternative of a single use housing development.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	-	-	+	0	+	-	+	-	-

Opportunities to Mitigate Negative Effects

None.

Policy SS2 – Queens Walk

Policy States:

'Planning permission will be granted for the comprehensive redevelopment of Queens Walk for a mix of uses comprising retail, restaurant/café uses at ground floor, office and/or residential uses at upper floor level. Proposals should:

- (1) Be of a design and use materials which enhance the pedestrian environment;*
- (2) Include details of how the proposals physically integrate and link with the rest of the Town Centre to encourage pedestrian movement;*
- (3) Meet its demand for car parking, having regard to the Town Centre character of the site and opportunities to promote more sustainable modes of travel;*
- (4) explain that where comprehensive development is not possible, the designs do not prejudice the development potential of any remaining land.*

Within this area some ground floor leisure uses in lieu of retail will be supported where it can be demonstrated that this will enhance the viability and vitality of East Grinstead Town Centre and reinforce it as the principal retailing and leisure location.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	+	+	+	-	+	+	+	+	+

Commentary

The policy is supportive towards retail, residential, commercial and leisure uses which will result in a positive score against the objectives concerned with a mixture of uses (objectives 2, 3, 8, 10 and 11).

The policy also scores well against sustainable objectives linked to transport/access since it will help focus new development within the town centre (objective 5, 7 and 9)

The policy is largely unrelated to the protection of the countryside/AONB and so a neutral score is relevant to objective 1.

The policy focuses on enhancing the existing Swan Walk and this would help reinforce objectives relating to the character of the town – objective 4 scores a positive impact.

Objective 6 relates to protection of open spaces and the Ashdown Forest. Whilst enhancements and new development within Swan Walk could protect open spaces, it may attract more visitors to the town that could have a negative effect on the Ashdown Forest.

Assessment of Reasonable Alternative Approaches

Enhancement of the town centre's commercial offer is very important in order to deter trade leakage to surrounding towns such as Crawley, and Tunbridge Wells. NPPF expects plans to encourage the vitality and viability of towns and the policy is sustainable in that context. The alternative is to consider different uses in this area such as housing. However, this would not maintain a balanced approach to land use planning which is sustainable.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	+	-	-	-	0	-	-	+	--	-

Opportunities to Mitigate Negative Effects

None

Policy SS3 – Imberhorne Lower School, Windmill Road

Policy States:

'Planning permission will be granted for the redevelopment of the site for residential uses, provided that:

- (1) A development brief has been adopted which explains the design approach for the site, including the mix of uses, any phased development and highway mitigation;*
- (2) The school site can be demonstrated to be surplus to requirements and alternative school provision has been secured elsewhere;*
- (3) The proposals include an element of public open space and children's play facilities; and*
- (4) The proposals include a mix of dwelling types including a meaningful proportion of family dwelling units of 2 and 3 bedrooms.*

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	++	+	+	-	0	-	0	+	0	0

Commentary

A housing allocation within the settlement would help meet the terms of the first objective by avoiding allocations outside the built up area – a positive score is therefore appropriate.

The policy could enable housing development to meet local needs and this scores very positively against objective 2.

Provision of housing together with making the playing pitch areas available for wider public use would benefit the amenities of local residents and so the policy scores well against objective 3.

Objective 4 is concerned with making new development complement the town. New housing development would meet that objective subject to design, which is a matter for other policy control. A positive score is therefore warranted.

Whilst new housing development within the urban area is sustainable, it would generate traffic. However this must be balanced against the lawful use as a school that also generates traffic. On balance car traffic generated by the housing use is likely to be greater than the existing use where children walk to school or use the bus. Consequently, a negative score would apply in relation to objective 5, and 7.

New housing would place pressure on Ashdown Forest and existing green spaces. However, SANGs and the play pitches that could be created on site would offset this. A neutral impact is appropriate against objective 6.

New housing would be unlikely to generate long-term employment and whilst it might underpin some new retail and other uses this would be limited. A neutral score is warranted against objective 8, 10 and 11.

Objective 9 is concerned with permeability and access to the town centre. The site could be within walking distance of the town centre and so a positive score is considered appropriate.

Assessment of Reasonable Alternative Approaches

Other uses could include built leisure, employment, retail or employment. There is an objectively assessed housing need and the site would be appropriate for that use. The site would be classed as 'out of town' and so unsuitable for retail. It is also an unsuitable location for employment. Given the characteristics of its surroundings, the policy is considered sustainable. This is reflected in the assessment below.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	-	+	-	-	0	-	+	0	+	+

Opportunities to Mitigate Negative Effects

None.

Policy SS4 – Birches Industrial Estate

Policy States:

Planning permission for extensions to existing buildings or the creation of new employment related development will be permitted within the Birches Industrial Estate subject to the following criteria:

- (1) The proposals are accompanied by a landscape strategy for the site;*
- (2) The proposals meet the adopted parking standards;*
- (3) Appropriate highway and infrastructure mitigation is provided;*
- (4) Proposals for new development include a proportion of smaller start up units for new business use; and*
- (5) Where possible an additional highway access should be provided to the north to alleviate pressure on vehicles turning from the A22 southbound onto the current access road and the agreement of the Highway Authority will be required.*

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	0	+	0	-	+	-	++	0	0	0

Commentary

The policy seeks to focus enhancement of the existing employment stock within the town and this deters development outside the built up area. The policy scores well against objective 1.

The policy is unrelated to housing development and a neutral score therefore applies to objectives 2, 10 and 11.

Provision of jobs is not technically an amenity but without them residents would not be able to access other amenities. A good quality employment area is, therefore, crucial to the town's future and so a positive score is warranted against objective 3.

New development within the industrial estate will not have any material bearing on Conservation Areas, town centre and the majority of the rest of the town. A neutral score is therefore considered appropriate against objective 4.

The policy encourages employment growth and enhancement outside of the main town centre and this is likely to be negative in relation to objective 5, and 7 relating to co2 emissions and reducing the need to travel.

Objective 6 relates to protection of green spaces and Ashdown Forest and the policy, by focusing on enhancements on the Estate, would positively meet this objective.

The policy scores well against objective 8 as it would encourage better employment provision.

Objective 9 is related to accessibility. The policy would build on existing access and infrastructure and a neutral score is considered relevant.

Assessment of Reasonable Alternative Approaches

The Estate could be reallocated for housing or retail/leisure uses, but alternative employment provision would be required. This would inevitably be unsustainable, as sites outside the built up area would have to be considered. There is considered to be no reasonable alternative to the policy given the infrastructure constraints that exist.

Assessment of Reasonable Alternative against Sustainability Framework										
1	2	3	4	5	6	7	8	9	10	11
--	+	+	+	-	--	-	--	-	+	-
Opportunities to Mitigate Negative Effects										
None										

Policy SS5 – Charlwood’s Industrial Estate

Policy States:

‘Planning permission will be granted for proposals for the comprehensive redevelopment of the Charlwood Industrial Estate for a mix of uses including housing, open space, community uses and smaller B1 business units and suites which range in size up to 300 sq. m.

The Town Council will prepare a development brief in association with other stakeholders to guide the development of this site in order to assist where proposals may come forward in smaller parcels due, to amongst other things, land ownership.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
+	+	+	+	+	+	+	-	0	-	+

Commentary

The policy seeks to focus enhancement of the existing employment stock within the town and this deters development outside the built up area. The policy scores well against objective 1.

The policy encourages a mixture of new uses and therefore scores positively on the objectives seeking specific types of land uses (objectives 2, 3, 11) except objective 8, which seeks to promote employment opportunities. Whilst this policy is promoting a range of uses, including small b1 business units, the main focus of the policy is on other uses and therefore a loss of employment type uses at this site may arise.

Different uses on this site is likely to reduce highway and traffic impacts at peak times, and therefore the policy scores positively in relation to objective 7. It is unlikely however to make significant changes on improving levels of accessibility and permeability to the town centre and therefore a neutral score has been applied to objective 9.

Comprehensive redevelopment of the site is likely to improve the town and therefore a positive score has been applied to objective 4.

Redevelopment will result in negative impacts on co2 emissions, however any new buildings will be much more energy efficient and therefore the impact overall on objective 5 is positive.

A redevelopment of this site could protect existing open spaces from development. It also specifically promotes the provision of new open space which means this policy has been scored positively in relation to objective 6.

The policy does not encourage retail uses and therefore a negative score has been applied.

Assessment of Reasonable Alternative Approaches

A reasonable alternative could be to encourage new employment development on the site only. However, this would reduce the prospects of meeting housing needs unless sites outside the built up area were chosen. Whilst this remains an option, new housing at this location would be sustainable and must be considered in relation to the proactive policy approach for the Birches. This policy is considered to be appropriate even though disadvantages may exist.

Assessment of Reasonable Alternative against Sustainability Framework										
1	2	3	4	5	6	7	8	9	10	11
-	+	+	+	+	-	0	+	0	+	-
Opportunities to Mitigate Negative Effects										
None										

Policy SS6 – Queen Victoria Hospital

Policy States:

“The loss of the hospital use will be resisted.

Proposals for new and extended hospital facilities and general practitioners services will be supported, including ancillary uses, subject to:

- (1) The design complementing the historic and architecturally significant elements of the hospital and protecting the character of the cottage hospital, tower and World War Two additions;*
- (2) The new buildings of up to four storeys in height subject to design justification and protecting the character of the cottage hospital, tower and World War Two additions;*
- (3) Appropriate landscaping with native species;*
- (4) Provision of adequate parking, drop off and pick up facilities, public transport infrastructure such as bus stops, taxi rank facility and travel plans for staff will need to be implemented;*

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	0	++	++	-	+	-	+	0	0	0

Commentary

The policy would not have any material effect on objective 1, 2, 10 or 11 and so a neutral score is considered appropriate.

The policy would preserve and support the health amenities of the town and objective 3 attracts a very positive score. The hospital has architecturally important elements to it and so the policy warrants a very positive score against objective 4.

The policy encourages growth at the hospital and this is likely to lead to negative impacts on co2 emissions and traffic generation – objective 5 and 7.

Objective 6 seeks to protect open spaces and Ashdown Forest. The policy, by encouraging development within the existing site, would score positively.

Objective 8 seeks to secure opportunities for employment and the hospital is a major employer within the town. A positive score is therefore warranted.

The hospital can be accessible from the town centre. The policy would not directly have an effect on objective 9 and so a neutral score is appropriate.

Assessment of Reasonable Alternative Approaches

The hospital is a necessary and beneficial facility. Given the physical scale of the site and the scale of operation there are no other obvious options available in terms of relocating the hospital, without occupying a countryside location. Opportunities exist on site for renewal and redevelopment and alternative uses would dilute the requirement for a single use health facility. The assessment considers the loss of the facility to another use.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
--	+	--	+	-	-	-	+	0	+	-

Opportunities to Mitigate Negative Effects

None

Policy SS7 - St Margaret's Loop

Policy States:

'Planning permission for any new buildings or for the change of use of St Margaret's Loop to domestic curtilage will be resisted.

Proposals that would provide a new combined pedestrian and cycle route through St Margaret's Loop connecting the Railway Station and the town centre from the A22 London Road and Lingfield Road area will be supported. Proposals for a new access should provide details of the materials to be used in creating the access track and an environmental management plan for this area.

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	0	++	++	+	++	+	+	+	-	-

Commentary

The policy would provide opportunities to walk and protect green spaces. This would have amenity benefits and help reduce co2 emissions through non-car mode being supported. The Policy provides for the protection of an alternative green space, which can only reduce recreational pressure on the Ashdown Forest. Consequently, the policy scores positively against objectives 3, 4, 5, 6, 7 and 9.

The policy has a positive effect on sustainable tourism (objective 8) but does not promote retail or mixed-use development for which a negative score is relevant (objectives 10 and 11).

In relation to objective 1 and 2 the policy has a neutral effect.

Assessment of Reasonable Alternative Approaches

The policy relates to an ecologically sensitive area which has limited access and is awkwardly shaped. Alternative uses and development would conflict with habitat objectives and would be limited due to the physical constraints. There are no reasonable alternatives to the proposed policy. The assessment considers the removal of the policy and so the prospects of domestication of the open space.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
0	0	-	-	0	-	0	0	-	0	0

Opportunities to Mitigate Negative Effects

No mitigation would be able to overcome any negative impacts associated with the assessment.

Policy SS 8 Land South of Birches Industrial Estate and West of Imberhorne Lane

Policy States:

Planning permission for modest development in the form of public open space, including SANGS (suitable alternative natural green space), which is subject to meeting the relevant criteria for their provision and to the approval of MSDC, playing fields, allotments, cemetery uses and ancillary support buildings such as small pavilions, kiosks or sheds will be supported where it can be demonstrated that the open character of the area will be retained.'

Assessment against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
++	-	++	+	+	++	+	0	0	-	-

Commentary

The policy would provide opportunities to access the countryside and help underpin the countryside area of constraint and rural setting of the town. It scores well against objective 1, 3, 4 and 6.

The policy will not deliver development in the form of housing and a negative score is appropriate for objective 2.

By providing an opportunity for an alternative destination to Ashdown Forest local residents may be inclined to walk. It is anticipated that a more accessible site closer to East Grinstead will reduce traffic impacts over all. Therefore objectives 5 and 7 has been positively scored.

It is not considered that the policy would have any material effect on objective 8 and 9 and because it would not assist in delivering retail and mixed uses within the town centre, would have a negative effect.

Assessment of Reasonable Alternative Approaches

An alternative approach would be to allocate the site for housing or alternative uses. However, the policy relates to an ecologically sensitive area and development would conflict with habitat and countryside objectives. The following assess the use of the site for built development.

Assessment of Reasonable Alternative against Sustainability Framework

1	2	3	4	5	6	7	8	9	10	11
--	+	0	-	-	--	-	+	-	0	+

Opportunities to Mitigate Negative Effects

No mitigation would be able to overcome any negative impacts associated with the assessment.

6 FURTHER REVIEW OF SUSTAINABILITY APPRAISAL

- 6.1 An eight-week public consultation exercise on the draft Neighbourhood Plan and this Sustainability Appraisal (“SA”) was held between 27th July 2015 and 21st September 2015. The consultation generated a large body of response and, in some cases, further development sites were suggested. Some relate to sites outside the built up area. However, the Town Council has taken the opportunity to review these alternative sites, identified by individuals and developers, and those defined as ‘Amber’ within Mid Sussex District Council’s SHLAA.
- 6.2 The sites that are identified ‘Red’ in the SHLAA were thoroughly reviewed and discounted on planning grounds by the District Council. On the basis that the SHLAA assessment clearly set out the sustainability and other material planning reasons why the Red sites should be set aside, the Town Council considers that there would be little merit/benefit in re-appraising them again. The Town Council is therefore relying on the conclusions and evidence within the SHLAA for these sites.

SHLAA Reference 21 – Land South of Copthorne Road										
1	2	3	4	5	6	7	8	9	10	11
--	+	0	-	-	--	-	-	0	-	+
SHLAA Reference 96 – Land East of Oakfield Way										
1	2	3	4	5	6	7	8	9	10	11
--	+	0	0	-	--	-	-	0	-	+
SHLAA Reference 224 – Land at Brooklands Park, West of Orchard Way										
1	2	3	4	5	6	7	8	9	10	11
0	+	0	+	-	0	+	-	0	-	0
SHLAA Reference 313 – Farrington House, Wood Street										
1	2	3	4	5	6	7	8	9	10	11
0	+	-	+	-	--	-	0	0	-	+
SHLAA Reference 513 – Land at Holtye Road and Blackwell Farm Road										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	+	-	+
SHLAA Reference 547 – Land at rear of Mulberry Gate, Copthorne Common Road										
1	2	3	4	5	6	7	8	9	10	11
--	+	0	-	-	--	-	-	0	-	+
SHLAA Reference 676 – Land South of 61 Crawley Down Road										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	-	-	--	-	-	0	-	+
Land at Imberhorne Farm										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	-	-	--	-	-	0	-	+
Land at Floran Farm, Hophurst Hill, Crawley Down										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	--	--	--	--	-	--	-	+
Land at Hill Place Farm (SHLAA ref. 562 Red site)										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	-	-	--	-	-	0	-	+
Land at 15 Crawley Down Road										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	-	-	-	-	-	0	-	+
Land at East Grinstead Squash Club, Ship Street										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	0	0	-	-	+	-	+
Street Anchor Evolve										
1	2	3	4	5	6	7	8	9	10	11
++	++	-	+	-	0	-	-	+	-	+
Commentary										
SHLAA 21 – Land south of Copthorne Road. This is an open Greenfield site outside the built up area. Its										

physical development would be detrimental and contrary to the longstanding countryside restraint policies and consolidate the growth of the town along the A264. The development of the site with housing would generate additional, mainly car borne traffic. The combination of these factors would have a negative impact.

New housing would be provided, which is positive.

SHLAA 96 – Land east of Oakfield Way. This is a wooded site outside the development boundary of East Grinstead. Consequently, the loss of this environmental resource would be detrimental. This has resulted in negative scores in relation to loss of countryside, open space and trees. The site could add to the housing provision locally, which would attract a positive score. It could also integrate with the town but would contribute towards additional traffic.

SHLAA 224 – Land at Brooklands Park, West of Orchard Way. This parcel of land is a valued open amenity space, with open grassland and pockets of mature and semi-mature trees. Its loss to development would be detrimental.

The site could provide for new housing and would be well integrated with the town. In this regard it would attract a positive score.

SHLAA 313 – Farrington House, Wood Street. An office development site which, if lost to alternative residential use, would have the potential to affect the employment stock. On this basis it would attract a negative score.

The site occupies a central location that contributes towards sustainability objectives. Its integration with the Town Centre would attract a positive score.

SHLAA 513 – Land at Corner of Holtje Road and Blackwell Farm Road. This is an attractive piece of open land within the town that contributes towards the visual amenities of the area. Its development would score negatively against criteria seeking to protect open space. Its use for housing would generate traffic and prevent other alternatives such as employment. It would not noticeably improve access to the Town Centre. The site would positively contribute towards new housing.

SHLAA 547 – Land to rear of Mulberry Gate, Copthorne Road, Felbridge. This is a Greenfield site that lies outside the built up area – its development would result in a loss of countryside. Its development would extend built form along the A264, which would not integrate well with the town and is not in the most sustainable location. The site would result in the loss of green space and on these matters scores negatively. Whilst offering potential to provide homes, which attracts a positive score, the single use of the site would not contribute to other sustainability objectives and scores negatively.

The development of the site would however, add to the housing stock, which would score positively.

SHLAA 676 - Land south of 61 Crawley Down Road. This is a Greenfield site that lies outside the built up area – its development would result in a loss of countryside. Its development would extend built form along the A264, which would not integrate well with the town and is not in the most sustainable location. The site would result in the loss of green space and on these matters scores negatively. Whilst offering the potential to provide homes, which attracts a positive score, the single use of the site would not contribute to other sustainability objectives and scores negatively.

The development of the site would however, add to the housing stock, which would score positively.

Land at Imberhorne Farm. This is a large area of open land to the west of East Grinstead. It lies outside the built up area in a countryside location between East Grinstead and Copthorne/Crawley. Its development would result in the loss of countryside and green, open space. The site is detached from the Town Centre and so scores negatively on these points. Its development offers the opportunity for housing to be provided and potentially other uses, which would score positively.

Land at Floran Farm, Hophurst Hill. This is a large area of open land to the west of East Grinstead. It lies outside the built up area in a countryside location between East Grinstead and Copthorne/Crawley. Its development would result in the loss of countryside and green, open space. The site is detached from the Town Centre and so scores negatively on these points. Its development offers the opportunity for housing to be provided and potentially other uses, which would score positively.

Land at Hill Place Farm. This site was assessed as part of the SHLAA and was identified as a Red site. It occupies a countryside location of some landscape value. It would site outside the built up area and would score negatively on these grounds. It would provide the opportunity for new housing and could include other uses, which would be positively scored.

Land at 15 Crawley Down Road. This was assessed under the SHLAA at SHLAA ref. 197. The site lies outside the built up area and is located along a major arterial road out of East Grinstead. Consequently it scores poorly in relation to loss of open space/ countryside and traffic generation. It would provide housing to contribute to housing stock and meets these objectives.

East Grinstead Squash and Racket Ball Club, Ship Street. This is a brownfield site in a central location and so would score positively against criteria, which seek to protect the countryside, create development, which integrates with the town and delivers housing. The site may not be able to deliver other uses and would potentially result in the loss of a leisure facility, which would not score as highly.

Assessment of Reasonable Alternative Approaches

Each of the sites has been assessed against the possibility of a different land use being allocated as alternatives to the provision of new homes. For those sites with an urban and suburban context and adjacent to the built up area, the variety of land uses that could be allocated instead is many. Consequently, the assessment assumes a commercial type of use including employment, retail or built leisure or a mixed use including some housing since these are the most likely uses that would be consistent with such a context.

The first assessment of alternatives below considers the alternative to the compact settlement strategy currently being progressed. This would include development beyond the built up area on countryside sites adjacent to the settlement or expanded new settlements beyond East Grinstead. This would result in development on greenfield sites not currently envisaged by the Adopted Local Plan 2004. Development would score negatively in relation to the loss of AONB or countryside land and in relation to the criteria judging impact on car borne travel and the character of East Grinstead. Such developments would deliver a positive score in relation to new housing and meeting housing needs but also a mixed approach including employment, retail and other commercial development would generate a positive score.

For those sites which lie outside the built up area (SHLAA Ref. 21, 96, 547, 676 and land at Imberhorne Farm, Floran Farm, Hill Place Farm and south of 15 Crawley Down Road) the realistic alternative to development would be to remain as open space or in some cases rear gardens. However, the assessment focuses on built development such as employment, retail or leisure, which would be poorly scored for the most part as development, would be outside the built up area, on greenfield land in the case of most forms of alternatives located inappropriately. Built development would, in the case of commercial activities, result in traffic generation. There may be some positive scores for employment provision and provision of retail and other uses.

For open space within the Town (SHLAA 224 and 513) the alternative built use for commercial would be detrimental to open space criteria and would result in built retail, employment and commercial in unsustainable locations which result in traffic generation. A built community use would score favourably.

Brownfield sites within the Town include the Squash club and SHLAA ref. 313. The loss of the existing uses would score negatively but replacement with commercial development such as retail would be of a small negative impact given their locations.

Assessment of Reasonable Alternative against Sustainability Framework – Urban Extensions to East Grinstead including mixed use and expansion of housing areas detached from East Grinstead

1	2	3	4	5	6	7	8	9	10	11
--	++	+	-	-	--	-	+	0	0	+

Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 21 – Land South of Copthorne Road

1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+

Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 96 – Land East of Oakfield Way

1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+

Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 224 – Land at Brooklands Park, West of Orchard Way										
1	2	3	4	5	6	7	8	9	10	11
0	+	0	+	-	0	+	-	0	-	0
Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 313 – Farrington House, Wood Street										
1	2	3	4	5	6	7	8	9	10	11
++	++	+	+	0	--	0	0	+	+	+
Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 513 – Land at Holtje Road and Blackwell Farm Road										
1	2	3	4	5	6	7	8	9	10	11
0	+	0	+	-	0	+	-	0	-	0
Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 547 – Land at rear of Mulberry Gate, Copthorne Common Road										
1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+
Assessment of Reasonable Alternative against Sustainability Framework - SHLAA Reference 676 – Land South of 61 Crawley Down Road										
1	2	3	4	5	6	7	8	9	10	11
--	+	-	-	-	--	-	-	0	-	+
Assessment of Reasonable Alternative against Sustainability Framework - Land at Imberhorne Farm										
1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+
Assessment of Reasonable Alternative against Sustainability Framework - Land at Floran Farm, Hophurst Hill, Crawley Down										
1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+
Assessment of Reasonable Alternative against Sustainability Framework - Land at Hill Place Farm (SHLAA ref. 562 Red site)										
1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+
Assessment of Reasonable Alternative against Sustainability Framework - Land at 15 Crawley Down Road										
1	2	3	4	5	6	7	8	9	10	11
--	-	+	-	-	--	-	0	-	-	+
Assessment of Reasonable Alternative against Sustainability Framework - Land at East Grinstead Squash Club, Ship Street										
1	2	3	4	5	6	7	8	9	10	11
++	++	+	+	0	--	0	0	+	+	+
Assessment of Reasonable Alternative against Sustainability Framework - Street Anchor Evolve										
1	2	3	4	5	6	7	8	9	10	11

Opportunities to Mitigate Negative Effects

Whilst in some cases a mixed use could be developed, in many cases it would involve some development occurring in inappropriate locations. The loss of the green and open character of some sites would be too detrimental to the character of the town, result in loss of landscape and countryside and be inappropriate in terms of further traffic generation. The reasonable alternative of urban extensions and detached groupings of development sites would not therefore be sustainable.

7 SUMMARY

- 7.1 This Sustainability Appraisal has revealed that the Neighbourhood Plan policies and the plan objectives have been founded on the principles of sustainability. Whilst some of the policies have a negative impact on the environment and other interests of acknowledged importance, there are other aspects of those policies, which contribute to social, economic or other objectives. It is clear, therefore, that a balanced approach must be taken. That said the District Plan would mitigate any impacts through a higher level of policy assessment.
- 7.2 There are no significant adverse effects, arising that would require residual mitigation and the Town Council is confident that the policies in the Plan will contribute to sustainable development.
- 7.3 Several Neighbourhood Plans are being prepared throughout Mid Sussex and some of these have cumulative effects. At the neighbourhood level it is considered that any effects will be minor on the environmental, social and economic characteristics of the plan area. Whilst there may be some uncertainties, the Mid Sussex District Plan remains in force and it covers the whole District. Since all Neighbourhood Plans are in conformity with it, there is considered to be no significant adverse sustainability impact arising from the policies of the Neighbourhood Plans.