Pre-Submission District Plan 2014-2031 Sustainability Appraisal: Non-Technical Summary June 2015

What is Sustainability Appraisal and Strategic Environmental Assessment?

- 1.1. Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:
 - Social
 - Environmental
 - Economic

Sustainability Appraisal (SA)

1.2. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the District Plan to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of Local Plans such as the District Plan – promoting strategy or policy that is sustainable, and ruling out strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the District Plan, whilst documenting how the plan meets the legal and policy requirements.

Strategic Environmental Assessment

- 1.3. Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004".
- 1.4. The SEA process is very similar to the Sustainability Appraisal process. The key difference is that it is only concerned with environmental impacts as opposed to social, economic and environmental impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.
- 1.5. Best practice suggests incorporating the SEA process into the Sustainability Appraisal due to their similarity in aim and methodology. This enables social, environmental and economic effects to be considered together in order to document the full picture of sustainability and to show a holistic outcome. The National Planning Practice Guidance (NPPG) states that "where the [SEA] Directive applies there are some specific requirements that must be complied with and which, in the case of Local Plans, should be addressed as an integral part of the sustainability appraisal process"².
- 1.6. This report will therefore include the elements required by the SEA Directive. Where practical, it will be signposted throughout the document where the requirements have been met, and what elements relate to SEA specifically. For simplification, the rest of this report and future stages will be referred to as the Sustainability Appraisal report, however it incorporates a SEA.

¹ The Report of the Brundtland Commission, 1987

² National Planning Practice Guidance, Ref. 11-003-20140306

The Sustainability Appraisal Report

- 1.7. The Pre-submission District Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved. It will cover a period up to 2031 and will replace the majority of the Mid Sussex Local Plan which was adopted in 2004.
- 1.8. The District Plan is a Development Plan and therefore must aim to meet the objectives of Sustainable Development. To ensure this is the case, this Sustainability Appraisal (incorporating SEA) Report was undertaken on the consultation draft District Plan in the period leading to the publication of the consultation draft, and has now been revised to take into account the results of the consultation and any significant changes that have been made to the District Plan since it was last published.
- 1.9. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development of different options for policy areas in the draft District Plan as well as the overall plan strategy. The findings of this work have been taken into consideration in determining the content of the District Plan and are documented within this report. This process will be repeated at all formal stages of the District Plan.
- 1.10. The Sustainability Appraisal process, along with the Strategic Environmental Assessment process, has widened the range of issues and options considered in formulating the proposals for the District Plan, in particular by focussing attention on the need to consider a range of potential social, economic and environmental effects. In turn, this has enabled the most sustainable policy approaches to be identified for inclusion within the District Plan.

How to Comment on This Report

- 1.11. The District Plan, along with this accompanying Sustainability Appraisal report, will be made available for public consultation for a minimum period of 6 weeks. All comments received on both of these reports will be taken into consideration in preparing the final District Plan to be submitted to the Secretary of State.
- 1.12. If you wish to comment on these documents, these should be sent to:

Email:

LDFConsultation@midsussex.gov.uk

Online:

www.midsussex.gov.uk/districtplan

Post:

Planning Policy and Economic Development Mid Sussex District Council Oaklands Oaklands Road Haywards Heath West Sussex RH16 1SS

Pre-Submission District Plan

- 1.13. The Pre-submission District Plan includes a vision for the District, upon which the plan is based on.
 - "A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well being of our District and the quality of life for all, now and in the future"
- 1.14. The District Plan sets out a number of strategic objectives. These are important as they state what the District Plan is aiming to achieve through its overall strategy and accompanying policies. The strategic objectives have been chosen in order to help solve or mitigate as many of the issues and challenges for the District as possible through the planning system.
- 1.15. The following are the 15 strategic objectives for the District Plan:

Priority themes	Strategic Objectives for the District Plan
Protecting and enhancing the environment	 To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence To protect valued landscapes for their visual, historical and biodiversity qualities To protect valued characteristics of the built environment for their historical and visual qualities To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks
Promoting economic vitality Ensuring cohesive and	 To promote a place which is attractive to a full range of businesses, and where local enterprise thrives To provide opportunities for people to live and work within their communities, reducing the need for commuting To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community To support a strong and diverse rural economy in the villages and the countryside To support and enhance the attractiveness of Mid Sussex as a visitor destination To support sustainable communities which are safe, healthy and
safe communities	inclusive 13. To provide the amount and type of housing that meets the needs of all sectors of the community 14. To create environments that are accessible to all members of the community
Supporting healthy lifestyles	15. To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations

Methodology

- 1.16. To undertake a Sustainability Appraisal of the District Plan, the council collected data about the District as it is today on social, environmental and economic issues. This is known as the 'baseline' and is documented in section 3 of the main report. This information enables the current (and potential future) social, environmental and economic issues facing the district to be established. The baseline consists of quantitative data as well as qualitative data a review of all plans, programmes and policies that impact upon the District Plan was also established to form a picture of the issues and challenges facing the District.
- 1.17. From this information, it was possible to identify sustainability objectives that the emerging policy options within the District Plan would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts from policies to be quantified and monitored in the future.
- 1.18. The report accompanies the Pre-submission District Plan. A similar report was published alongside the consultation draft District Plan and was subject to consultation. Comments received at this stage were analysed and have been addressed in the Pre-submission report where appropriate.

Current Sustainability Issues

1.19. From the examination of the baseline data and plans, programmes and policies that could influence the District Plan it was possible to identify the current sustainability issues faced by the District. These issues are summarised as follows:

Social

- an increasing population, and the need for additional infrastructure capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- existing school capacity issues will need to be addressed
- existing secondary schools in Burgess Hill will not have capacity to cater for the number of pupils generated by large-scale development envisaged in the north/northwest of Burgess Hill
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged
- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the

- District mostly in relation to access to local community services this can create social exclusion.
- low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.
- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts
 on traffic and environmental quality. Whilst it is recognised that commuters make a
 significant financial contribution to the District, it is important that appropriate
 employment opportunities are promoted within the District to ensure people who live
 locally can work locally.
- The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained
- There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems.
- The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.

Sustainability Framework – Objectives and Indicators

- 1.20. By taking the above issues it was possible to identify sustainability objectives for the District. These objectives were used to assess how the various policy options (known as 'realistic alternatives') being explored for the District Plan would contribute to the objectives of sustainability. The set of indicators could also be used to devise a monitoring framework for assessing how the policy proposals affect the objectives upon adoption of the District Plan.
- 1.21. A total of 18 Sustainability Objectives (and their associated indicators) were devised:

SOCIAL

To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford

Social

- housing completions per annum (net)
- number of affordable homes completed annually (gross)
- financial contributions towards affordable housing provision
- number of low cost home ownership households delivered annually
- number of households accepted as full homeless

To improve the access to health, leisure and open space facilities and reduce inequalities in health.

Social

- number of applications resulting in new, extended or improved health facilities
- number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital
- number of households within 300m of leisure and open space facilities (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study)
- financial contributions towards leisure facilities
- amount of leisure floorspace (Use Class D2) completed per annum (gross)

To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.

Socia

- percentage of population of working age qualified to at least NVQ level 3 (or equivalent)
- percentage of adults with poor literacy and numeracy skills
- number of households within a 15 minute walk (approx. 1.2km) from a Primary School
- number of households within a 20 minute walk (approx. 1.6km) from a Secondary School

4 To improve access to retail and community facilities.

Socia

- number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)
- number of households within a 15 minute walk (approx. 1.2km) from a convenience store
- number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)

5 To create cohesive, safe and crime resistant communities

Social

- all crime number of crimes per 1000 residents per annum
- number of domestic burglaries per 1,000 households

ENVIRONMENTAL

6

7

Environmenta

To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), and seek to reduce the risk of flooding. (SEA)

- percentage of the District that is within Flood Zone 2/Flood Zone 3
- number of properties at risk from flooding, as defined by the Environment Agency
- number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds

Environmenta

To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.

- percentage of new and converted homes developed on brownfield land
- percentage of new employment floorspace on previously developed land
- density of new housing developments
- amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development

8 To conserve and enhance the District's biodiversity. (SEA)

- number and area of SNCIs and LNRs within the District
- area of ancient woodland within the District
- condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar)
- number of planning applications approved contrary to advice given by Natural England on biodiversity issues
- Number of dwellings permitted within the 7km Zone of Influence (SPA)

Environmenta

Environmenta

9 To protect, enhance and make accessible for enjoyment, the District's countryside. (SEA)

- open spaces managed to green flag standard
- number of major developments in the South Downs National Park / High Weald AONB
- number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation PPG17 Study)

Environmenta

10 To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)

- number of Listed Buildings in the District
- buildings of Grade I and II* and scheduled monuments at risk
- number of Conservation Areas in the District
- number of Conservation Areas with appraisals and management proposals

Environmenta

To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)

- number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)
- number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)
- number of households within a 15 minute walk (approx. 1.2km) of a train station

- proportion of journeys to work by public transport
- percentage of residents living and working within Mid Sussex
- monetary investment in sustainable transport schemes (value of s. 106 agreements)
- Number of Air Quality Management Areas (AQMAs) within the District

Environmenta

To reduce waste generation and disposal, and achieve the sustainable management of waste, including the amount of waste that is either re-used or recycled.

- percentage of domestic waste that has been recycled
- percentage of domestic waste that has been composted

Environmenta

To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)

- Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"
- incidents of major and significant water pollution within the District
- number of planning applications approved contrary to advice given by the EA on water quality issues
- number and area of developments where appropriate remediation of contaminants has taken place
- number of developments built to BREEAM / Code for Sustainable Homes standards

Environmenta

To increase energy efficiency and the proportion of energy generated from renewable sources in the District and to utilise sustainably produced and local products in new developments where possible.

- number of developments built to BREEAM/ Code for Sustainable Homes standards
- domestic energy consumption per household
- number of renewable energy installations within Mid Sussex
- installed capacity of renewable energy installations within Mid Sussex

ECONOMIC

15

16

14

Economic

To encourage the regeneration of the District's existing Town Centres and support the viability and vitality of village centres.

- Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)
- number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)

Economic

To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.

- percentage of Mid Sussex residents who are unemployed
- percentage of Mid Sussex residents who are economically active
- average weekly income for those who are employed in the District
- percentage of residents living and working within Mid Sussex
- job density (ratio of jobs to working age population)

- net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace
- number of businesses within the District
- number of new businesses setting up in the District

Ec	0	
ĝ		- percentage of jobs in the tourism sector
- total trips to Mid Sussex for tourism purposes		total trips to Mid Sussex for tourism purposes
omic		total spend by those visiting Mid Sussex for tourism purposes

number of visitors staying overnight

Compatibility of Objectives

Economic

1.22. The 18 sustainability objectives were compared with each other and against the objectives for the District Plan. This process enabled any conflicts between the objectives to be identified. By identifying these conflicts, possible ways of reducing or preventing these conflicts when assessing the District Plan could be found. Overall the majority of objectives were found as being compatible with one another. This is documented within the main report in section 5.

Developing and Appraising Options

- 1.23. In preparing the District Plan, a number of policy areas were considered, and a range of options for each policy area were identified. The policy areas have been based largely on:
 - The need for the policy to meet the objectives of the District Plan vision and the Sustainable Community Strategy.
 - Issues for the District that have been identified through baseline information collected or consultation (for example, in consultation with Town and Parish Councils).
 - Identification of need through the evidence base for example, the need for policies on sustainable resource use, affordable housing and employment space.
 - Identification of the need to enhance or supplement existing national planning policies at a local level, often based on local targets.
 - Options put forward by respondents to the consultation draft District Plan and accompanying Sustainability Appraisal.
- 1.24. The preferred policy option from all of the options appraised has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the 'preferred option'. In order to record the sustainability of the varying options, a range of colours and symbols has been used:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
+?	Possible positive or slight positive impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-?	Possible negative or slight negative impact on the sustainability objective
-	Negative impact on the sustainability objective
	Significant negative impact on the sustainability objective

- 1.25. All of the reasonable options have been appraised using these symbols, against the methodology outlined in section 2 of the main report. Once appraised, mitigation for any predicted negative impacts has been identified.
- 1.26. The majority of the District Plan policy areas were generally found to impact positively on the social, environmental and economic objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated by one of the other policies within the District Plan.
- 1.27. A summary of the sustainability appraisal findings for each of the strategy and policy areas within the District Plan is shown in the table below:

Appraisal of the Plan Strategy

(preferred option highlighted in bold text)

Distribution of Development

Options

- **A)** Focus development within or adjacent to the three towns only (Burgess Hill, East Grinstead, Haywards Heath), maximising the use of brownfield land where possible, and restricting growth of other settlements
- **B)** Focus development towards the three towns (as Option A) but allows the larger villages with good service provision to take some growth. Smaller villages would only take growth essential to meet local needs.
- C) Focus development within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs.
- **D)** Focus development towards a new settlement.

Summary of Appraisal

Focussing development towards the three towns, as per option (a) would be detrimental towards the many villages of the District. The villages each have their own housing and employment needs which need to be met—meeting these needs will have positive knock-on effects, as increased development in these areas (at an appropriate scale) can help improve local infrastructure such as health, education and retail/community facilities.

It is therefore not surprising that options (b) and (c) score more positively on the social and economic objectives as it allows for development outside of the towns. Option (d) would in itself provide such facilities (due to the scale of development) but this may be to the detriment of existing facilities within the District and there would be uncertainty as to whether these facilities would be delivered in the short/medium term.

All options score more negatively on the environmental objectives, as allowing development is in conflict with preserving the environment (as demonstrated in section 5 of the main report). However, these negative impacts are likely to be mitigated by other policies within the District Plan, and will be minimised.

Preferred Option: (c)

Settlement Sustainability - Hierarchy	
Options	Summary of Appraisal
Each settlement within the District has been appraised for its relative sustainability, based on information contained within the Settlement Sustainability Review report.	Mid Sussex contains three large towns (Burgess Hill, East Grinstead and Haywards Heath), a number of larger villages, smaller villages and hamlets. This is largely reflected in the appraisal undertaken. There are a number of predicted positive effects under the social objectives. In general, and as noted in section 3 of this report, most areas of the District have reasonable access to health facilities, although there are some pockets of the District that rely on services provided in neighbouring towns/villages. Access to education is better, with most villages including at least one primary school within 15 minutes' walk, and most settlements have access to retail and community facilities either within their settlement or provided elsewhere – although greater choice of retail facilities only exist in the towns and larger villages in general. All settlements score generally positively for economic objectives, as all have the possibility of increasing population to sustain economic growth and provide an increased workforce. Unsurprisingly, there are a number of potential negative effects predicted under the environmental objectives. This reflects the generally rural, constrained nature of the District as demonstrated in the Capacity Study. Impacts on the environmental objectives are generally less negative for the larger settlements. There are significant negative effects predicted for settlements that do not have a built-up area boundary, as any development will be within an area of development restraint which could have knock-on effects for the provision of facilities. Any development will need to balance the negative environmental impacts against the predicted positive impacts for social and economic objectives. This will be particularly important for household and employment development to meet local needs.

Housing Provision - Unmet Needs of I	Neighbours
Options	Summary of Appraisal
A number of options have been appraised to assess the sustainability of meeting unmet housing needs of neighbouring authorities, to varying degrees (i.e. all, some or none).	Providing for additional development in Mid Sussex to meet the unmet housing needs of neighbouring local authorities is not without its own challenges. Mid Sussex District is constrained in its own right, and the greater the amount of development provided by the authority, the greater the likelihood of significant adverse effects arising. In addition, any negative impacts that have been identified in the assessments for meeting the unmet need of Mid Sussex's neighbours would be cumulative, on top of any potential negative impacts already identified from meeting Mid Sussex's own housing provision in the District Plan. In terms of prioritisation, it makes more sense to provide for the needs of those neighbouring authorities
	have fully explored and assessed their own capacity to accommodate their own needs, where strong economic functional relationships exist, and where there are good public transport links to enable travel by more sustainable modes. This is most likely to be Crawley and Brighton & Hove.

point for OAN as shown in the HEDNA. B) 600 dpa – based on an indexed starting point for OAN (CLG 2011 and CLG 2008) as shown in the HEDNA. C) 650dpa – based on the starting point for OAN as per CLG 2012 as shown in the HEDNA Update. Would meet OAN. new housing within the District as this is the aim the policy. However, options (a) and (b) do not meet the District's Objectively Assessed Need therefore don't fully meet the aims of this policy. Option (c) would meet the Objectively Assesse Need, therefore provides sufficient housing to account for future projected population/demographic changes (births/deaths/migration).	Housing Provision		
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	HEDNA Update. Would meet OAN.	(Situro, doda io, migration).	
		Whilst options (d) and (e) would also achieve this,	
	•	it is questionable as to whether these options are	
Supply William and String Subtamasinty		deliverable – the SHLAA indicates that there may	
According to Cross Boundary Options in it.	· · · · · · · · · · · · · · · · · · ·	not be enough suitable sites to achieve this, this is reflected in the more negative scores under the	
	would exceed OAN.	environmental objectives. In order to achieve	
	F) 800+dna - based on economic forecasting	these levels of growth, it would mean allocating	
Would exceed OAN less suitable/unsuitable sites to meet the nous		less suitable/unsuitable sites to meet the housing	
provision. This would have knock-on effects	Troula oxocoa or it i	provision. This would have knock-on effects on	
		environmental objectives such as those concerned with biodiversity, protecting the countryside, road	
congestion and water quality.			
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All options would have largely beneficial impa		All options would have largely beneficial impacts	

for the other social objectives, although options proposing lower housing numbers may not facilitate the need or contribution towards additional or enhanced facilities, and higher options could put a strain on existing facilities should new facilities not be delivered, particularly if the housing provision is met by a number of smaller sites (therefore not contributing new facilities on-site) as opposed to large strategic locations which should provide new facilities dependant on need/size. Option (c) is the balance between the two.

As expected with any proposals for new development, all options will lead to negative impacts on the environmental objectives. This is to be expected given the potential conflicts identified in section 5 of this SA. In particular, options (d) and to a larger extent (e) are proposing levels of development that the Sustainability Assessment of Cross Boundary Options considered would have significant environmental impacts. Evidence within the Transport Study and Capacity Study suggests that options (d) and (e) could also have more negative impacts on environmental objectives.

All options would have positive impacts on economic objectives by providing an increased workforce within the District, which in turn will sustain economic growth.

Options (a) and (b) are acceptable environmental terms but may not deliver the social benefits compared to options proposing higher housing numbers. However, it is clear that options proposing over 700dpa (i.e. options (d) and (e)) should be ruled out as there are not enough suitable sites to meet this provision, would require allocating all suitable sites identified in the SHLAA (which may not be suitable or sustainable in combination), and would have negative impacts on a number of environmental objectives. Option (e) and to some extent option (d) are also nearing the limit that the Sustainability Appraisal of Cross-Boundary Options suggested would have significant effects, particularly on environmental objectives.

Option (c) is the 'tipping point' in sustainability terms between acceptability and unacceptability when weighing up whether positive impacts on social and economic objectives outweigh any negative impacts on environmental objectives. Option (c) meets housing need at the same time as not having a demonstrable negative impact on the environment compared to options (d) and (e).

Preferred Option: (c)

Strategic Location Options **Options Summary of Appraisal** A) Land to the North of Burgess Hill (known As all options are seeking to provide housing, as the 'Northern Arc') - approx. 3,385 which has secondary impacts on other dwellings. SHLAA ref: #493 community infrastructure (education, health, retail, and community facilities) it is unsurprising B) Land to the East of Burgess Hill (East of that the majority of the options are generally Kings Way) - approx. 500 dwellings. expected to have positive impacts on the social SHLAA ref: #233 objectives. There are a few exceptions however- it is uncertain whether options (d). (e) C) Land to the South of Burgess Hill (South of and (p) are deliverable within the plan period and therefore their effects are limited. Whilst a number of the options could potentially contribute to meeting housing need in Mid Sussex, a number are not considered to be Folders Lane) approx. 1,000 dwellings suitable for development within the SHLAA. SHLAA ref: #557 generally for environmental reasons. Therefore, any positive effects on social objectives are very likely to be counter-acted by negative impacts D) Land to the West of Burgess Hill (West of on environmental objectives. Jane Murray Way) - approx. 1,500 dwellings. Overall, there are generally negative impacts on the environmental objectives. This is no E) Land to East/South of Crawley (Crabbet surprise, as the exercise carried out in section 5 Park) – approx. 2,300 dwellings. SHLAA ref: highlighted that, for housing objectives, there is #18 a conflict with environmental protection objectives due to the opposing nature of these F) New Market Town (Savers Common area) objectives. There are, however, some potential approx. 10,000 dwellings. SHLAA ref: #678 positive impacts to be expected, particularly from site **(b).** There are some severe negative impacts expected to arise from sites (g), (i) and G) Land North of Cuckfield Bypass (Cuckfield) (o) which could not be mitigated easily. - approx. 500 dwellings. SHLAA ref: #240 All options aside from (e), (f), (m) and (o) are expected to have a generally positive impact on H) Land adj. Great Harwood Farm (East the economic objectives. This is because all Grinstead) – approx. 600 dwellings. SHLAA other options are likely to provide a workforce ref: #17 (and in some cases, employment land) and I) Land north east of Lindfield (Lindfield) ensure high and stable employment levels. approx. 1,200 dwellings. SHLAA ref: #498 There are expected to be negative impacts from (e), (f), (m), (o) and (p) predominantly due to J) Land east of Northlands Brook and south of their location - these sites may be to the Scamps Hill (Lindfield) - approx. 500 dwellings. SHLAA ref: #483 detriment of existing towns and villages of Mid Sussex by providing a workforce/employment K) Haywards Heath Golf Course (Haywards opportunities away from these areas, where a Heath) - approx. 500 dwellings. SHLAA ref: need exists. This may, in turn, discourage #503 regeneration of town and village centres within L) Eastlands, Lewes Road (Scaynes Hill) the District. approx. 630 dwellings. SHLAA ref: #515 Overall, sites (a) and (b) are the most M) Hardriding Farm, Brighton Road (Pease sustainable sites over all objectives, predominantly because of their positive impact Pottage) – approx. 500 dwellings. SHLAA ref: on the social and economic objectives in #666

N) Land South of Pease Pottage (Pease
Pottage) – approx. 660 dwellings. SHLAA ref:
#603

O) Land at Lower Tilgate (Pease Pottage) – approx. 1,750 dwellings. SHLAA ref: #243

P) Broad Location North and East of Ansty – approx. 2,000 dwellings. SHLAA ref: #736

comparison to other options and negative impacts on environmental impacts no worse than other options, and in some cases can be mitigated.

Preferred Options: (a) and (b)

Locations for Employment Options Summary of Appraisal a) To allocate 20-30ha of land as a high The allocation of this area for a business park quality business park at Burgess Hill to the will have the most significant impacts on the east of Cuckfield Road. Small scale economic objectives, which is expected given employment use will be supported as long the nature of this policy. It will provide as it is in accordance with other policies in opportunities for employment close to where demand may be arising from, in particular new the plan. strategic development within Burgess Hill, as (Note: At the current time, there are no other well as further afield. This could have secondary alternative options for this scale of employment positive impacts on many of the social within the District. Sites smaller than this scale objectives. are more of relevance for allocation in Neighbourhood Plans, and will therefore be Overall, there are generally negative impacts on appraised through the individual Sustainability the environmental objectives. This is no Appraisals for these plans) surprise, as the exercise carried out in section 5 highlighted that. for policies concerning development, there conflict is а environmental protection objectives due to the

opposing nature of these objectives

Neighbourhood Plans	
Options	Summary of Appraisal
A) To use Neighbourhood Plans to allocate the level and location of new development (housing, employment, community facilities) in order to contribute towards meeting the District's overall needs (i.e. a bottom-up approach in the spirit of Localism).	Both options are likely to have overall positive sustainability impacts, however option (a) is expected to have a more positive impact than option (b). This is predominantly because Neighbourhood Plan areas are likely to accept development in order to focus on the infrastructure issues important to them (schools, health, education, community facilities,
B) To use the District Plan / Allocations Document to determine the level and location of new development in the Towns and Parishes (i.e. a top-down approach).	transport). Development is therefore more likely to be taking place in areas that need it most as the level and location will be determined by a bottom-up approach (in line with the national 'localism' agenda). Preferred Option: (a)

Appraisal of Policy Options

District Plan Policy	Sustainability Appraisal Findings
DP1: Sustainable Development in Mid Sussex	The preferred option is more specific about defining what is important (in sustainability terms) for Mid Sussex. This is therefore likely to lead to more positive impacts against the sustainability objectives.
DP2: Sustainable Economic Development	This policy will be key in meeting the District Plan's economic objectives, as it sets the framework for allocating new employment land over the plan period. It will have significant positive benefits for the economic objectives, as well as indirect positive benefits for some social and environmental objectives in comparison to other options considered. This is due to the

	policy directing employment growth to areas where there is a need and supporting existing businesses, in urban and rural
	areas, as well as addressing future employment land provision if/when required.
DP3: Town Centre Development	Encouraging the development of retail within town centre locations, where possible, will deliver economic benefits to these areas. This policy will allow for greater accessibility to retail use, particularly by public transport. This will have positive sustainability impacts, plus a number of indirect positive impacts could arise from this policy.
DP4: Village and Neighbourhood Centre Development	Encouraging the development of retail within villages, where possible, will deliver economic benefits to these areas. Restricting unsuitable uses (including changes of use) will also protect vital village services, which will have a number of direct and indirect sustainability benefits. This policy will allow for greater accessibility to retail use, particularly by public transport. This will have positive sustainability impacts, plus a number of indirect positive impacts could arise from this policy.
DP5: Housing	This is appraised as part of the strategy – summary above.
DP6: Settlement Hierarchy	This is appraised as part of the strategy – summary above.
DP7: General Principles for Strategic Development at Burgess Hill	Overall, setting out the general principles that apply to all strategic development at Burgess Hill is likely to have a positive impact on the majority of objectives. This is because a policy is likely to ensure that social, environmental and economic needs are met, such as improved access to services and provision of decent and affordable homes. Whilst strategic development could have a negative impact on environmental objectives such as biodiversity and access to the countryside, a policy could ensure that provision is made for biodiversity enhancement and green infrastructure which would mitigate against any possible negative impacts. Strategic development is also likely to have a positive effect on employment levels and economic growth.
DP8: Strategic Allocation to the east of Burgess Hill at Kings Way	The combination of these policies will have positive impacts on the social, environmental and economic objectives. This is due to the fact the policies ensure that any strategic development at
DP9: Strategic Allocation to the north and northwest of Burgess Hill	Burgess Hill is delivered in the most appropriate way so as to maximise economic, social and environmental benefits, and mitigate against any possible negative impacts that may arise for these objectives. The combination of these policies will have positive impacts on the social, environmental and economic objectives. This is due to the fact the policies ensure that any strategic development at Burgess Hill is delivered in the most appropriate way so as to maximise economic, social and environmental benefits, and
	mitigate against any possible negative impacts that may arise for these objectives.
DP10: Protection and Enhancement of Countryside	It is considered that for the majority of objectives, this policy will have positive impacts. In particular, the environmental objectives should have a strong positive impact that may increase over time. This policy will allow development in the countryside providing it does not harm, and where possible, enhances the quality of the rural and landscape character. This means that there may be positive impacts on the economic and social objectives, whilst at the same time having a positive impact on the environmental objectives which is the overall aim of this policy.

DP11: Preventing Coalescence	In the short term, the de-designation of existing local gaps could have negative impacts on the countryside and historic environment, although speedy preparation of Neighbourhood Plans will ensure that major positive benefits for these objectives will be obtained in the long term, as preserving land between certain settlements is shown to have positive effects both directly, and indirectly.
DP12: Sustainable Rural Development and the Rural Economy	The proposed policy should have positive social and economic benefits. It is considered that the policy may contribute to unsustainable transport patterns and therefore the transport and climate change objectives could possibly be adversely impacted upon, however reasonable mitigation measures are in place in the form of other policies within the District Plan.
DP13: New Homes in the Countryside	Although this policy option has the potential to negatively impact on several of the objectives, it is considered that it is necessary to have a policy that restricts new dwellings in the countryside to those that are required by agricultural and forestry workers. This is likely to have positive impacts on employment and economic growth as well as providing the workers with a decent and affordable home.
	Other policies in the District Plan are likely to help mitigate some of the negative impacts that may arise from this policy, and these are particularly related to access to services and the environmental objectives. Objective 7 is likely to have the strongest negative impact as this policy option does not encourage re-using previously developed land.
	Overall, whilst this policy option is likely to have negative impacts on some of the sustainability objectives, it is considered that it is necessary to enable dwellings for agricultural and forestry workers to be allowed in certain circumstances, in particular where this contributes to agricultural and land management objectives.
DP14: High Weald Area of Outstanding Natural Beauty	This main objective of this policy is for development proposals within the AONB to have regard to the High Weald AONB Management Plan; hence it has significant positive impacts on the environmental and tourism objectives. Over the longer term, the policy may also have positive impacts on the social and economic objectives. The policy may, however, have a negative impact on providing for decent and affordable homes, but the Rural Exception Sites policy may help to mitigate this impact.
DP15: Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA)	This policy aims to mitigate the effects of recreational pressure arising from new residential development surrounding the Ashdown Forest SPA and SAC. It is clear that overall this policy will have positive impacts, particularly on the environmental and social objectives. There is likely to be no impact on the majority of the economic objectives. This policy requires new residential development within a certain zone of influence to provide mitigation so there may be possible negative effects on the objective concerned with providing decent and affordable homes. As a form of green open space, Suitable Alternative Natural Greenspace (SANG) is likely to have positive effects on the social and environmental objectives which are likely to increase over time. For example, there are likely to be positive benefits on access to health, education and community facilities, as well as helping to reduce road congestion and address one

	of the causes of climate change.
DP16: Setting of the South Downs National Park	Although this policy option has the potential to negatively impact on several of the objectives, it is considered that it is necessary to have a policy that considers development proposals (including rural exception sites) adjacent to the South Downs National Park to ensure that they enhance and do not detract from the visual quality and essential characteristics of the area. This is likely to have positive impacts on the environmental objectives such as biodiversity, the countryside and the historic environment. This policy will help protect and enhance the countryside through consideration of the setting of the South Downs National Park. Other policies in the District Plan are likely to help mitigate some of the negative impacts that may arise from this policy, and these are particularly related to the provision of homes, access to services and the economic objectives. Overall, whilst this policy option is likely to have negative impacts on some of the sustainability objectives, it is considered that it is necessary to consider the setting of the South Downs National Park ensuring that development proposals enhance the visual quality and characteristics of the area and that the significant positive impacts on environmental objectives outweigh any potential negative impacts that could arise from this policy.
DP17: Sustainable Tourism	This policy is likely to have no or little impact on the majority of objectives. It is clear that this policy has strong positive impacts for the economic objectives and as can be expected, on the tourism objective. This is also likely to have positive impacts over time for the objectives on efficient land use, protecting and enhancing the countryside, and protecting and enhancing the historic environment. This policy, however, may have negative effects for the objectives on climate change, road congestion and water quality although these should be mitigated by other policies.
DP18: Securing Infrastructure	Positive social, environmental and economic benefits should accrue from this policy, particularly for those objectives that are linked to new and/or improved health, education, leisure, recreation and other community services and facilities, particularly in the long term.
DP19: Transport	Positive benefits should accrue from this policy. Improved travel choice and transport infrastructure is shown to have positive social, environmental and economic impacts – particularly over the long term.
DP20: Rights of Way and other Recreational Routes	It is clear that this policy will have will have the strongest positive impact on objective 10 as rights of way and recreational routes will help to protect and enhance the countryside. This policy is also likely to have a positive impact on health as rights of way will provide opportunities for physical activity and wellbeing. There may also be positive impacts on access to services, addressing the causes of climate change, biodiversity, reducing road congestion and encouraging tourism. Overall, this policy is likely to have positive effects on the environmental and social objectives, and this impact may increase over time.
DP21: Communication Infrastructure	This policy will impact positively on social and economic objectives by ensuring that up-to-date communications

	infrastructure can be delivered within the District, which will support economic aims and the indirect positive effects that could occur as residents are able to work from home more
	efficiently, reducing the need to regularly commute.
DP22: Leisure and Cultural Facilities and Activities	The provision of new leisure and cultural activities and facilities will have positive impacts on the objectives concerned with improving access to health and education, as well as improving the local environment. Similarly, it will be important to retain existing facilities in order to continue to positively impact on these sustainability objectives, something that this policy requires. This policy should also have an economic benefit in terms of encouraging tourism.
DP23: Community Facilities and Local Services	Retention of community facilities will have positive impacts on a number of objectives, particularly the social objectives concerning access to health, education and services. This is also likely to have a positive impact on the economic objectives as it may create jobs and help economic growth. This policy may also have a positive impact on the environmental objectives such as improving access to the countryside and reducing road congestion through proximity to services. It will also have major positive effects through the provision of new facilities for larger developments.
DP24: Character and Design	No negative sustainability impacts are expected to result from this policy. Good design should be seen as key in achieving social, environmental and economic aims.
DP25: Dwelling Space Standards	Overall, this policy will have little or no impact on the majority of objectives. As this policy requires development to meet internal floor and storage space standards set out as part of the policy, it may have a positive impact on the social objectives concerning good quality housing. There is likely, however, to be a negative effect on the efficient use of land as this policy will impact the density of dwellings, although the Character and Design and Housing Mix and Density policies in the proposed submission District Plan should help to mitigate any negative impacts.
DP26: Accessibility	Overall, this policy will have little or no impact on the majority of objectives. As this policy requires development to meet high standards of accessibility, it may have a positive impact on the social objectives concerning housing and access to health, education and services. There may also be a positive impact on employment levels as this policy aims to improve the accessibility of the built environment. There could, however, be a negative effect on the historic environment as this policy could impact on the integrity of listed buildings and their setting, although the Historic Environment policies in the District Plan should help to mitigate any negative impacts.
DP27: Noise, Air and Light Pollution	This policy will have positive impacts on the environmental objectives, particularly in relation to minimising the levels of air pollution within the District which will impact positively on climate change objectives. Noise and light pollution restrictions will impact positively on the social objectives.
DP28: Housing Mix	It is considered that this policy will ensure that the appropriate mix of dwellings is delivered taking into account the local housing needs. It is likely to have a positive impact on several of the objectives, particularly objectives 1 and 16. This policy is also likely to positively impact on those objectives relating to access to health, creating crime resistant communities and the

	natural and built environment.
DP29: Affordable Housing	The provision of affordable housing is a much needed social requirement for Mid Sussex and therefore a number of positive social impacts should arise from this policy. This should also lead to a number of indirect economic benefits (i.e. increased provision of affordable housing assisting in the retention of key workers). Option A should ensure that the level of affordable housing required from new developments will not be financially restrictive, and ensure that social objectives relating to provision of facilities will not be affected.
DP30: Rural Exception Sites	The main objective of this policy is to deliver 100% affordable housing schemes where a need exists; which is why it has a very positive impact on the housing objective. This policy is considered to possibly impact negatively on objectives that concern accessibility to community services and facilities, including public transport, schools and retail. This has a knock-on negative effect on climate change objectives. The level of housing that will be delivered through this policy is unlikely to be significant, therefore the negative impacts will be relatively minor. Other mitigation measures, as mentioned
	above, will help to reduce the negative sustainability impacts on such objectives.
DP31: Gypsies, Travellers and Travelling Showpeople	It is clear that this policy has a positive impact on the social objectives, although it will be necessary to ensure that gypsy and traveller sites are not located in areas of flood risk. This policy has a neutral impact on the economic objectives, however, there may be a negative impact on some of the environmental objectives, but this should be mitigated by other policies.
DP32: Listed Buildings and Other Buildings of Merit	It is clear that this policy will have the strongest (positive) impact on objective 10 as it is intended to conserve and enhance the character and setting of listed buildings and other buildings of merit. This policy may also have a positive impact on the countryside and tourism objectives. By protecting the setting of listed buildings, there may be a negative impact on the objectives relating to homes, access to services, efficient land use and climate change, although these should be mitigated by other District Plan policies to some extent.
DP33: Conservation Areas	The proposed policy should have positive social and economic benefits. It is considered that the policy may contribute to unsustainable transport patterns and therefore the transport and climate change objectives could possibly be adversely impacted upon, however reasonable mitigation measures are in place in the form of other policies within the District Plan.
DP34: Historic Parks and Gardens	Overall positive benefits should arise from this policy. In ensuring that these valued historic sites are retained and protected, a number of very positive environmental sustainability benefits should be seen, as well as encouraging tourism which will benefit economic objectives. A small number of indirect social benefits could also be gained.
DP35: Archaeological Sites	Overall positive benefits should arise from this policy. In ensuring that these valued historic sites are retained and protected, a number of very positive environmental sustainability benefits should be seen, as well as encouraging tourism which will benefit economic objectives. A small number of indirect

	social benefits could also be gained.
DP36: Trees, Woodland and Hedgerows	The preferred policy option is more stringent in its requirement of protecting all forms of woodland, as well as those which are important to amenity, landscape and historic character.
DP37: Biodiversity	This policy should result in positive benefits, particularly for the environmental objectives. It can be seen that over the longer term, positive benefits will increase and there will be a positive impact on some of the social objectives. Overall, this policy should achieve the biodiversity objective and contribute to enhancing the natural and built environment, as well as addressing the causes of climate change.
DP38: Green Infrastructure	Overall, this policy should result in positive impacts on the sustainability objectives, particularly for the environmental objectives. It can be seen that over the longer term, positive benefits will increase and there may also be positive impacts for some of the other sustainability objectives. In particular, it is clear that the strongest impacts will be on the sustainability objectives that relate to functions of green infrastructure, especially addressing the causes of climate change, conserving and enhancing biodiversity, and protecting and enhancing the countryside.
DP39: Sustainable Design and Construction	Overall, this policy will have little or no impact on the majority of objectives. As a policy would require proposals to demonstrate how they address sustainable design and construction it should have a positive impact on environmental objectives concerning energy efficiency, reduced waste generation and road congestion, and improved water quality. There may also be a positive impact on housing as the policy will improve the energy performance of new dwellings.
DP40: Renewable Energy Schemes	Overall, this policy will have little or no impact on the majority of objectives. A policy would provide a positive strategy for promoting renewable and low carbon energy development while ensuring that impacts are addressed satisfactorily.
DP41: Flood Risk and Drainage	This policy would mainly have positive impacts on the flood risk (objective 6), housing (objective 1) and water (objective 13) objectives but could achieve other sustainability benefits through the implementation of SuDS. Anticipated additional benefits associated with well-design SuDS (and identified in local guidance) would likely be realised over the longer term as development proposals incorporate these systems into site designs and those developments are completed.
DP42: Water Infrastructure and the Water Environment	Overall, this policy will have little or no impact on the majority of objectives. The policy will have a positive impact on a number of environmental policies particularly in regard to water quality and will have a positive impact on existing and future housing by ensuring water services are provided in a timely and effective manner.

1.28. The Sustainability Appraisal process is an iterative process. It is likely that further policy areas and options will be put forward during the preparation of the District Plan, particularly during consultation on the draft document. If these options are considered to be realistic alternatives to those already suggested they will be assessed through the Sustainability Appraisal process during the next stage of its production. The findings of this process will be considered in the next stage of production for the District Plan – prior to its submission to the Secretary of State.

Social Conclusion

1.29. There is an overall positive impact to be expected in terms of the social objectives. The District Plan will include many policies that have direct impacts on these objectives, in particular policies facilitating growth – housing and employment. There are also a number of secondary benefits from policies relating to the environment – for example provision of open space, which can have social (health) benefits. Some potential negative social impacts may arise from policies that are seeking to protect the environment in particular DP15 which seeks to protect the setting of the National Park. This is not likely to have wide-ranging negative impacts overall.

Environmental Conclusion

1.30. The District Plan contains policies that aim to protect and enhance the environment. Overall, positive impacts are likely to be expected from most policies, including some of those promoting growth in the District. This is because the polices are not restrictive and allow for some development whilst ensuring that the valuable environment in Mid Sussex is protected.

Economic Conclusion

1.31. The District Plan includes specific policies with regards to growth of the economy, which will inevitably have significant positive benefits. There are also secondary benefits likely to be achieved from policies promoting housing, infrastructure and community facilities. Very few negative impacts on the economic objectives are likely to arise from the proposed policies in the District Plan.