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# **Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan**

Final Report  
Prepared by LUC  
February 2015

**Project Title:** Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan

**Client:** Mid Sussex District Council

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# 1 Introduction and Background

- 1.1 Mid Sussex is one of seven Districts within West Sussex County in the South East of England where pressure for development, particularly housing and associated infrastructure, is high. Mid Sussex District Council (MSDC) has reached an advanced stage in the preparation of its new Local Plan, known as the District Plan. During the District Plan publication period objections were received from Brighton & Hove City Council, Adur and Worthing Councils and Lewes District Council on the grounds that they had unmet needs for housing and that Mid Sussex had not met its duty to cooperate with them. The Plan was submitted to the Secretary of State in July 2013 and initial examination hearings were held; however the Inspector concluded that the Council had not met the Duty to Co-operate and the Plan was subsequently withdrawn from the examination process by the Council.
- 1.2 Since then, the Council has been working to address the Inspector's concerns and prepare a revised District Plan. One recommendation for a specific way forward was proposed by the Inspector:
- "The Council should give detailed and rigorous consideration to the development needs of nearby authorities and draw robust conclusions with regards to whether or not any of those needs could be met in a sustainable way within the District, bearing in mind the environmental and other constraints that exist"* (para. 45)<sup>1</sup>.
- 1.3 The first stage of work was to determine the capacity of the District to accommodate additional development, by identifying primary and secondary constraints to development as well as determining the most/least sustainable locations for development (in terms of access to services) in the District. This was undertaken in the Capacity Study (2014)<sup>2</sup>.
- 1.4 The second stage of work has involved the Council writing to all neighbouring and nearby authorities (1st August 2014) asking for further information on any unmet needs and for them to confirm their position. This included Adur, Brighton & Hove, Crawley, Lewes, Tandridge, Wealden and Worthing. In addition, LUC was commissioned in August 2014 to undertake a Sustainability Assessment of cross-boundary options, the objectives of which were to:
- Assess the sustainability impacts of any requests for Mid Sussex to accommodate the unmet needs of other local authorities (the 'requesting authorities') on both Mid Sussex and the requesting authorities' areas.
  - Draw conclusions regarding the cross-boundary nature of effects, in terms of Social, Environmental and Economic impact.
- 1.5 The overall aim of this study is to provide a sound Sustainability Assessment of the impacts of requests from neighbouring authorities to accommodate their unmet housing needs within Mid Sussex. The study has followed a similar methodology and reporting style to a Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) in order to be compatible and comparable with the SA/SEA work of the District Plan done to date, although this is not a statutory report and is therefore not required to meet all the requirements of the SEA Regulations. The Sustainability Assessment has built upon previous work, particularly the Mid Sussex Capacity Study and SA/SEA work by Mid Sussex District, in order to assist Mid Sussex District Council in revising the District Plan and meeting the duty to cooperate.
- 1.6 This Sustainability Assessment will feed in to the statutory Sustainability Appraisal (incorporating SEA) that will be prepared by Mid Sussex District Council to accompany the District Plan. The Sustainability Appraisal will test varying levels of growth within Mid Sussex – both to meet Mid Sussex needs and aspirations, and levels of growth higher than this in order to meet neighbouring authorities' unmet needs. The information and conclusions within this Sustainability Assessment

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<sup>1</sup> <http://www.midsussex.gov.uk/media/ID-16DTCOConclusion.pdf>

<sup>2</sup> Mid Sussex District Capacity Study. LUC, 2014. Available online at <http://www.midsussex.gov.uk/9441.htm>

will feed in to the latter by appraising all reasonable alternatives for accommodating neighbour's needs in a detailed and robust way.

- 1.7 In preparation of this Sustainability Assessment, the neighbouring authorities that are subject to the assessment (Adur, Brighton & Hove, Crawley, Lewes, Tandridge, Wealden and Worthing) have been consulted on the baseline, appraisals and conclusions and provided LUC with comments to ensure factual accuracy. All Council's welcomed and supported the principle and aims of this piece of work.

## 2 Approach to the Sustainability Assessment

- 2.1 The Sustainability Assessment of the cross boundary options for accommodating unmet housing need of neighbouring authorities has been undertaken in the following stages:
- Establishing the baseline context and key sustainability issues.
  - Developing reasonable options for assessment.
  - Undertaking the sustainability assessment in line with the existing SA framework used for the Mid Sussex District Plan.

### Baseline context and key sustainability issues

- 2.2 The initial task in this study was to establish the current baseline context and key sustainability issues in order to understand the reasons that the neighbouring authorities are unable to meet their own housing need over the plan period.
- 2.3 This was achieved by reviewing the most recent Sustainability Appraisal reports for the Local Plan/Core Strategy (or any other relevant plans) of each neighbouring authority and identifying the key sustainability issues and challenges that the authority faces.
- 2.4 The findings of this exercise are presented in **Chapter 3**, and constitute a summary of the baseline information for each district, presented in terms of the key environmental, economic, social sustainability issues that the district faces, covering:
- Nature conservation.
  - Landscape.
  - Heritage.
  - Air and climate.
  - Water.
  - Soils.
  - Human characteristics (we assume this to mean demography, deprivation, etc.).
  - Road and transport (focussing particularly on public transport networks and traffic congestion issues).
  - Infrastructure (such as water supply and waste water treatment, public sector services, flood risk, etc.).
  - Economic characteristics (e.g. employment sites, town centres, employment rates, economic sectors, etc.).
- 2.5 **Chapter 3** also includes a summary of the reasons why the authority cannot meet its housing needs.

### Options development

- 2.6 To develop reasonable options for assessment, data on the objectively assessed housing need (OAN) for the neighbouring authorities of Mid Sussex was used, along with the current planned provision of housing within their latest Core Strategies/Local Plans, to estimate the amount of housing that may need to be delivered in Mid Sussex to meet the unmet needs of the neighbouring authorities over the Mid Sussex District Plan period.



- 2.7 The data used was obtained from a range of sources, including the proforma that was circulated to the neighbouring authorities by Mid Sussex District Council. The proforma requested information from each authority on the type of unmet development need required (i.e. housing or employment), the details of the unmet need, the timing of the requirements (i.e. are they later on in the plan period), the location of the need, whether any other authorities have been approached to deliver some of the need and the implications for the authority if their need is not met. Where the unmet need was not specifically quantified by the neighbouring authorities, data was gathered from sources such as most recent objectively assessed housing need studies, CLG Household Projections and Local Plan documents.
- 2.8 25 options in total were identified, four relating to meeting some or all of the unmet need of all neighbouring authorities, or a combination of the neighbouring authorities, and the remaining 21 options consider meeting all or some of the unmet need of each neighbouring authority individually. The 25 options and detailed methodology of the development of the options for assessment are presented in **Chapter 4**.

## Options Assessment

- 2.9 The options for meeting unmet need of Mid Sussex neighbouring authorities were assessed using the SA framework that has been used to date in the SA of the Mid Sussex District Plan, and most recently set out in the July 2014 SA Scoping Report. The SA framework comprises 18 Sustainability Objectives, shown in **Table 2.1**. Minor wording amendments to SA objectives 5, 6 and 17 were made to address consultation responses on the Scoping Report, and the final set of SA objectives are presented in Table 2.1 below.
- 2.10 The same SA framework has been used to assess the options for meeting neighbouring authorities' unmet housing need so that the findings of this study will be compatible and comparable with existing and future SA work undertaken for the District Plan.

**Table 2.1: SA Framework for the Mid Sussex District Plan and used in this Sustainability Assessment**

SA Objective	Indicators
<b>Social Objectives</b>	
1: To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford	<ul style="list-style-type: none"> <li>• housing completions per annum (net)</li> <li>• number of affordable homes completed annually (gross)</li> <li>• financial contributions towards affordable housing provision</li> <li>• number of low cost home ownership households delivered annually</li> <li>• number of households accepted as full homeless</li> </ul>
2: To improve the access to health, leisure and open space facilities and reduce inequalities in health.	<ul style="list-style-type: none"> <li>• number of applications resulting in new, extended or improved health facilities</li> <li>• number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital</li> <li>• 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)</li> <li>• financial contributions towards leisure facilities</li> <li>• amount of leisure floorspace (Use Class D2) completed per annum (gross)</li> </ul>
3: To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational	<ul style="list-style-type: none"> <li>• percentage of population of working age qualified to at least NVQ level 3 (or equivalent)</li> <li>• percentage of adults with poor literacy and numeracy skills</li> <li>• number of households within a 15 minute walk (approx. 1.2km) from a Primary School</li> </ul>

SA Objective	Indicators
facilities.	<ul style="list-style-type: none"> <li>number of households within a 20 minute walk (approx. 1.6km) from a Secondary School</li> </ul>
4: To improve access to retail and community facilities.	<ul style="list-style-type: none"> <li>number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)</li> <li>number of households within a 15 minute walk (approx. 1.2km) from a convenience store</li> <li>number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)</li> </ul>
5: To create cohesive, safe and crime resistant communities.	<ul style="list-style-type: none"> <li>all crime – number of crimes per 1000 residents per annum</li> <li>number of domestic burglaries per 1,000 households</li> </ul>
<b>Environmental Objectives</b>	
6: To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), and seek to reduce the risk of flooding. (SEA)	<ul style="list-style-type: none"> <li>percentage of the District that is within Flood Zone 2/Flood Zone 3</li> <li>number of properties at risk from flooding, as defined by the Environment Agency</li> <li>number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds</li> </ul>
7: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.	<ul style="list-style-type: none"> <li>percentage of new and converted homes developed on brownfield land</li> <li>percentage of new employment floorspace on previously developed land</li> <li>density of new housing developments</li> <li>amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development</li> </ul>
8: To conserve and enhance the District's biodiversity. (SEA)	<ul style="list-style-type: none"> <li>number and area of SNCIs and LNRs within the District</li> <li>area of ancient woodland within the District</li> <li>condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC &amp; Ramsar)</li> <li>number of planning applications approved contrary to advice given by Natural England on biodiversity issues</li> <li>number of dwellings permitted within the 7km Zone of Influence (SPA)</li> </ul>
9: To protect, enhance and make accessible for enjoyment, the District's countryside. (SEA)	<ul style="list-style-type: none"> <li>open spaces managed to green flag standard</li> <li>number of major developments in the South Downs National Park / High Weald AONB</li> <li>number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study)</li> </ul>
10: To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)	<ul style="list-style-type: none"> <li>number of Listed Buildings in the District</li> <li>buildings of Grade I and II* and scheduled monuments at risk</li> <li>number of Conservation Areas in the District</li> <li>number of Conservation Areas with appraisals and</li> </ul>

SA Objective	Indicators
	management proposals
<p>11: To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)</p>	<ul style="list-style-type: none"> <li>• number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)</li> <li>• number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)</li> <li>• number of households within a 15 minute walk (approx. 1.2km) of a train station</li> <li>• proportion of journeys to work by public transport</li> <li>• percentage of residents living and working within Mid Sussex</li> <li>• monetary investment in sustainable transport schemes (value of s.106 agreements)</li> <li>• number of Air Quality Management Areas (AQMAs) within the District</li> </ul>
<p>12: 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.</p>	<ul style="list-style-type: none"> <li>• percentage of domestic waste that has been recycled</li> <li>• percentage of domestic waste that has been composted</li> </ul>
<p>13: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)</p>	<ul style="list-style-type: none"> <li>• Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"</li> <li>• incidents of major and significant water pollution within the District</li> <li>• number of planning applications approved contrary to advice given by the EA on water quality issues</li> <li>• number and area of developments where appropriate remediation of contaminants has taken place</li> <li>• number of developments built to BREEAM / Code for Sustainable Homes standards</li> <li>•</li> </ul>
<p>14: 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.</p>	<ul style="list-style-type: none"> <li>• number of developments built to BREEAM/ Code for Sustainable Homes standards</li> <li>• domestic energy consumption per household</li> <li>• number of renewable energy installations within Mid Sussex</li> <li>• installed capacity of renewable energy installations within Mid Sussex</li> </ul>
<p><b>Economic Objectives</b></p>	
<p>15: To encourage the regeneration of the District's existing Town Centres and support the viability and vitality of village centres.</p>	<ul style="list-style-type: none"> <li>• Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)</li> <li>• number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)</li> </ul>
<p>16: To ensure high and stable levels of employment so</p>	<ul style="list-style-type: none"> <li>• percentage of Mid Sussex residents who are unemployed</li> <li>• percentage of Mid Sussex residents who are economically</li> </ul>

SA Objective	Indicators
everyone can benefit from the economic growth of the District.	<ul style="list-style-type: none"> <li>active</li> <li>average weekly income for those who are employed in the District</li> <li>percentage of residents living and working within Mid Sussex</li> <li>job density (ratio of jobs to working age population)</li> </ul>
17: To support economic growth and competitiveness across the District.	<ul style="list-style-type: none"> <li>net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace</li> <li>number of businesses within the District</li> <li>number of new businesses setting up in the District</li> </ul>
18: To encourage the development of a buoyant, sustainable tourism sector.	<ul style="list-style-type: none"> <li>percentage of jobs in the tourism sector</li> <li>total trips to Mid Sussex for tourism purposes</li> <li>total spend by those visiting Mid Sussex for tourism purposes</li> <li>number of visitors staying overnight</li> </ul>

- 2.11 As explained further in Chapter 4, the 25 options for meeting unmet need of Mid Sussex's neighbouring authorities were grouped per neighbouring authority, with one group of options relating to meeting levels of need for all neighbouring authorities. A matrix for each group of options was prepared to identify the likely sustainability effects of the options on each SA objective, using the same matrix format and colour coded scores that were set out in the July 2014 SA Scoping Report (see table below). Assumptions and justifications for the scores are also described in the matrices, which are presented in **Appendix 2** of this report. The SA findings are summarised in **Chapter 5**.

++	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
+/-	Mixed minor and positive impacts may occur on the sustainability objective

- 2.12 Note that LUC introduced the use of potential 'mixed' effects to record instances where there may be different types of positive and negative effect on the same objective (e.g. where landscape character might be negatively affected by development, but new residents would have easy access to the countryside, a mixed negative and positive effect was recorded for SA objective 9, which seeks to protect, enhance and make accessible for enjoyment, the District's countryside). In addition, LUC used a '?' on a number of scores to represent uncertain effects, as certain effects depend very much on where development actually occurs, and there is currently uncertainty regarding the specific locations for any development to meet neighbouring authorities' unmet housing need.
- 2.13 The main aim of this task was to consider the likely effects that would be experienced in Mid Sussex District if additional housing to meet the needs of neighbouring districts/boroughs was delivered within Mid Sussex. However, the assessment has also considered the effects on the neighbouring authority concerned, depending upon the scenario presented under the option. This is particularly evident for social and economic objectives. Consideration has also been given to the likely cumulative sustainability effects, and this is also described in **Chapter 5**.

## 3 Baseline context and key sustainability issues

- 3.1 This section sets out the findings of the desk-based review of the most recent available information contained within the Sustainability Appraisal reports for the Local Plan/Core Strategy of each neighbouring authority. It provides a summary of the current baseline context and key sustainability issues in order to understand the reasons that the neighbouring authorities are unable to meet their own housing need over the plan period. The type of information provided within the Sustainability Appraisal reports for each neighbouring authority varies and therefore direct comparative analysis between the authorities on the basis of this information is not recommended.
- 3.2 **Figure 3.1** shows the location of Mid Sussex and its neighbouring authorities as well as nationally and internationally designated nature conservation sites and landscapes. **Tables 3.1** and **3.2** summarise the environmental, social and economic baseline statistics for each neighbouring authority under the headings of:
- Nature conservation.
  - Landscape.
  - Heritage.
  - Air and climate.
  - Water.
  - Soils.
  - Human characteristics (we assume this to mean demography, deprivation, etc.).
  - Road and transport (focussing particularly on public transport networks and traffic congestion issues).
  - Infrastructure (such as water supply and waste water treatment, public sector services, flood risk, etc.).
  - Economic characteristics (e.g. employment sites, town centres, employment rates, economic sectors, etc.).
- 3.3 A summary of the key sustainability issues and possible reasons why the neighbouring authorities are unable to meet their own housing need over the plan period is provided for each authority below.

### Adur District

- 3.1 Development in the District is located mainly in the south. Development within the District would be constrained as most land within the District has already been developed and the administrative boundary is tightly drawn around the built-up area, with the sea to the south. This means land supply within the District is quite limited. To the north most of the mainly undeveloped area which makes up around half of the total area of the District is within the South Downs National Park. The Adur Local Plan covers only that part of Adur which lies outside the South Downs National Park. The Adur Estuary is classified as a Site of Special Scientific Interest (SSSI) and is located in the south of the District.
- 3.2 There are a total of seven conservation areas and 118 listed buildings in the District. Additionally to the north west and north east are the Scheduled Monuments at Park Brow and Thundersbarrow Hill respectively.
- 3.3 The two Air Quality Management Areas (AQMAs) at the High Street in Shoreham and the Old Shoreham Road in Southwick may constrain development within Adur as any development in close proximity to these areas may adversely affect air pollution in the District.

- 3.4 Significant areas have high flood risk due to the coastal and riverine location of the District. The potential for flooding along the River Adur is a particular threat in the south and south east of the District. The Shoreham Adur Tidal Walls Scheme aims to improve flood defences along the east and west banks of the River Adur. Technical approval has been received for the project and the Environment Agency has secured funding to start the detailed design phase of the scheme. An indicative completion date for the tidal walls is 2017.
- 3.5 A significant amount of people that live in Adur commute to work outside of the District and high levels of congestion have been identified on the A259 and A27.

### **Brighton & Hove City**

- 3.6 The authority is heavily developed to the south and there is a lack of redevelopment sites within the urban area. The undeveloped area to the north falls mainly within the South Downs National Park's boundaries (40% of Brighton and Hove falls within the Park).
- 3.7 There is a total of 3,400 listed buildings and 34 conservation areas in Brighton & Hove. In total there are 15 scheduled monuments within the boundaries of the Authority, for example to the north the earthworks and lynchets near Eastwick Barn, Patcham have been designated as such.
- 3.8 Development within the City may be constrained in close proximity to the Brighton and Portslade AQMA (declared in 2013) due to potential detrimental impact on air pollution.
- 3.9 There are no designated main rivers, or ordinary watercourses, within Brighton & Hove, although the City area shares approximately 14km of its boundary with the sea. Much of the area is at risk from tidal flooding although flood defences are in place. There remains a residual risk that these defences could fail or be overtopped during a flood event.

### **Crawley Borough**

- 3.10 The Borough is mainly unconstrained by landscape designations with only a small part of the Borough falling within the South Weald Area of Outstanding Natural Beauty (AONB) to the south. Development within the Borough would however be constrained as most land within the Borough has already been developed and the administrative boundary is tightly drawn around the built-up area. This means land supply within the Borough is quite limited.
- 3.11 There are eight conservation areas, 100 listed buildings and four scheduled monuments located throughout the Borough which could affect the potential for development.
- 3.12 Extensive areas of Crawley are at high and moderate risk of flooding. Areas which fall into Flood Zone 3 (at high risk of flooding) have been identified mainly in the north of the Borough and extend to the south and south east and south west. Crawley is served by a multiple of waterbodies including Stanford Brook, Crawter's Brook and Gatwick Stream. The multitude of these watercourses has put extensive parts of the built up areas in Crawley at risk of flooding. There is also a significant risk from surface water flooding within the Borough.
- 3.13 There is one AQMA in Crawley (Tinsley Lane).It has also been noted there is an upward trend of NO<sub>2</sub> concentrations in the Borough which has affected air quality.
- 3.14 Any future new development in Crawley and the surrounding area has the potential to increase water supply issues and sewerage capacity problems.
- 3.15 Pressures already exist on transport infrastructure in the area which is approaching capacity. Further development in the area may be constrained by the ability of this infrastructure to accommodate future demands. Secondary Schools will be at capacity with current planned housing growth. Additionally possible further growth of Gatwick Airport (should the second runway be approved) has the potential to put pressure on existing infrastructure.

### **Lewes District**

- 3.16 The District contains important landscapes, areas of biodiversity and other protected areas – there are numerous sizeable SSSIs within the District and these account for a total of 2,437 hectares of designated land; additionally 55% of the District is within the South Downs National Park. This designation impacts upon all towns within the District by limiting the amount existing towns can grow (for example, urban extensions).

- 3.17 The District has numerous heritage assets which may constrain and be impacted upon by development within the area - Lewes has 35 conservation areas which cover 493ha as well as 1,710 listed buildings within its boundaries. The Battle of Lewes battlefield site is registered as a heritage asset and is located in the centre of the District.
- 3.18 Flooding is a risk within the District – sizeable areas of Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (high probability of flooding) exist to the north and north west of the District – 11% of the District is within Flood Zone 2 and/or 3. The threat comes from main rivers such as the Sussex Ouse and its principal tributaries.
- 3.19 Many of the rivers in Lewes have been identified as having water quality which falls well below national average in Environment Agency’s categories for assessing water bodies.
- 3.20 Air quality is an issue in certain parts of the District – an AQMA has been identified in Lewes town centre and a further AQMA is to be designated in the area of South Way, Newhaven.
- 3.21 Congestion on certain key highway routes is an issue within the district, in particular the A259 that serves the coastal towns where the main centres of population live. The ability to release further capacity in this part of the highway network is limited, in part due to geographical and environmental constraints (i.e. the presence of the sea and the South Downs National Park).

### **Tandridge District**

- 3.22 The vast majority of Tandridge District is designated green belt (approximately 94%). Tandridge has two AONBs within its boundaries which may be adversely impacted upon by future development. The High Weald AONB is to the south east corner of the District while the Surrey Hills AONB crosses the northern part of the District. In total there are eight SSSI’s within the Authority. Those which are closest to Mid Sussex are to the south and south east, and include Hedgecourt, Blindley Heath and Lingfield Cernes.
- 3.23 Tandridge has designated 19 conservation areas (which cover approximately 256ha), almost 600 listed buildings and 20 scheduled monuments. These heritage assets may act to constrain future development.
- 3.24 Areas at high risk (Flood Zone 3) and moderate risk (Flood Zone 2) of flooding have been identified in the south of the District - 695 properties have been identified within an area of Flood Zone 3 and 1,314 properties within Flood Zone 2.
- 3.25 There is a net out-commuting figure of over 10,000 people per day from the District. 55% of those who commute out of the District work in London.

### **Wealden District**

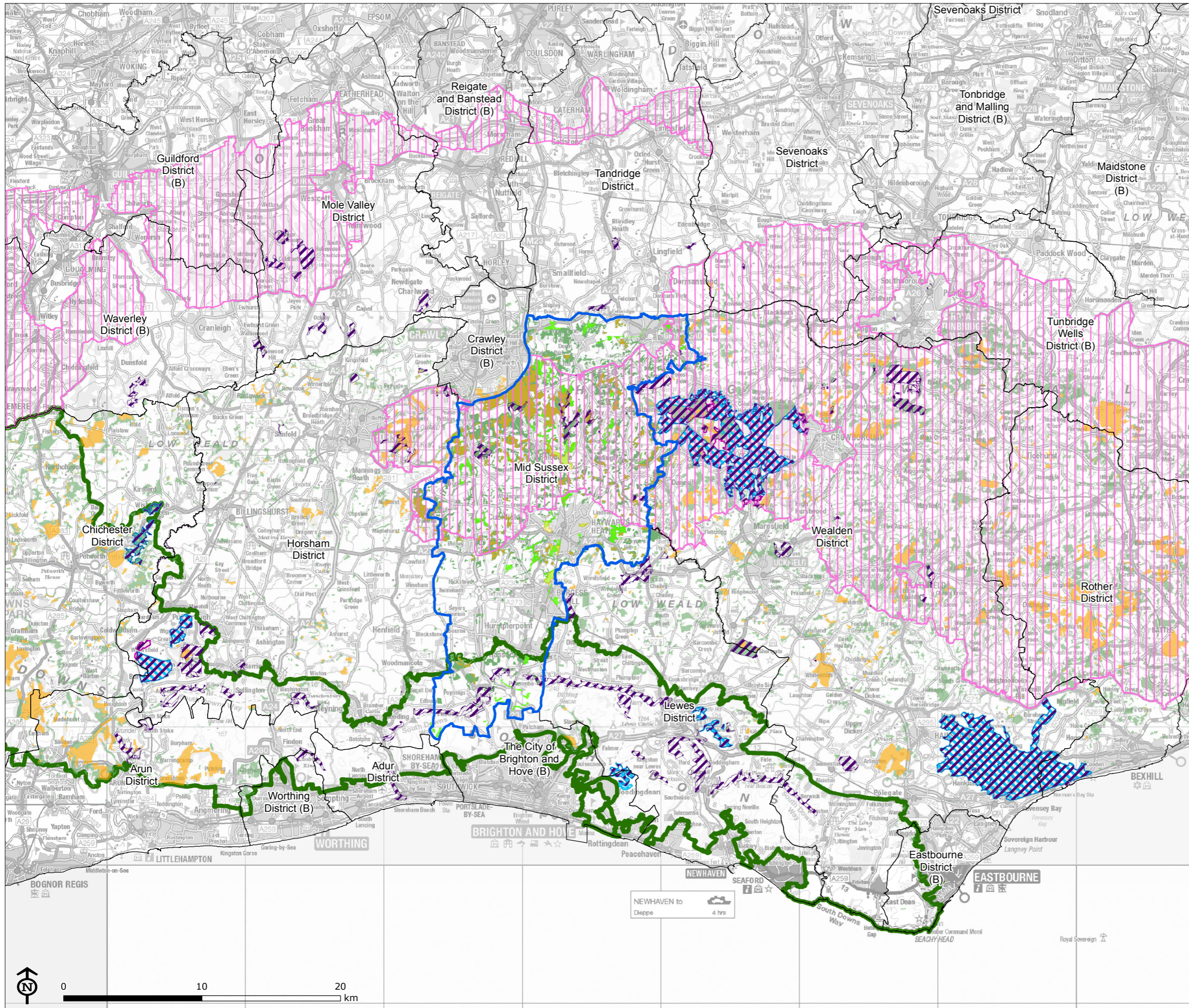
- 3.26 The landscape within Wealden District is dominated by the High Weald AONB which covers around half of the District to the north. Of particular importance within the boundaries of the AONB is the Ashdown Forest which has been designated as a Special Protection Area (SPA) and Special Area of Conservation (SAC), and is known to be particularly sensitive to nitrogen deposition and recreational pressure. The sizeable Pevensy Levels SSSI and Site of Community Importance (SCI) designation is located in the south east of the District. The most southerly portion of the District falls within the South Downs National Park.
- 3.27 There are a number of important heritage assets in Wealden – in total there are 34 conservation areas, and numerous listed buildings and registered parks and gardens. Most of these registered parks and gardens are concentrated in the northern half of the District and they include Eridge Park, Buckhurst Park and Buxted Park.
- 3.28 Areas at high risk of flooding (Flood Zone 3) and at moderate risk of flooding (Flood Zone 2) have been identified mainly in the west and north west of Wealden particularly around the River Medway.
- 3.29 Wealden has a supply of best and most versatile agricultural land – of its total land area 136 ha (0.1%) is Grade 1 Agricultural Land; 4450 ha (2.6%) is Grade 2 Agricultural Land; and 104,140 (60.9%) is Grade 3 Agricultural Land (of which Grade 3a is considered to be best and most versatile agricultural land).



### **Worthing Borough**

- 3.30 The Borough is extensively developed to south towards the seafront. Development within the Borough would be constrained as most land within the Borough has already been developed and the administrative boundary is tightly drawn around the built-up area, with the sea to the south. This means land supply within the Borough is quite limited.
- 3.31 The undeveloped land within Worthing is mainly within the South Downs National Park, accounting for approximately a quarter of the Borough. One SSSI, Cissbury Ring, is located within the Borough to the north east.
- 3.32 There are 26 conservation areas and 360 listed buildings within Worthing. The Cissbury Ring hill fort, prehistoric flint mine and associated remains is in the north east part of the Borough and has been designated as a scheduled monument.
- 3.33 There is one AQMA within Worthing which may constrain development – it is located around Grove Lodge roundabout in Worthing.
- 3.34 Worthing is at risk from flooding from the sea at lower lying regions. There are also two river flood zones in Worthing: the area of the Ferring Rife to the west of the Borough and Teville Stream to the east.
- 3.35 Car ownership in the Borough is slightly higher than the national average. Worthing is particularly congested along the northern edge of the A27, while the A259 is also congested.





# Mid Sussex District Plan Capacity Study

**Figure 3.1: Environmental designations in Mid Sussex and neighbouring local authorities**

- Mid Sussex district
- Surrounding districts
- Site of Special Scientific Interest (SSSI)
- Area of Outstanding Natural Beauty (AONB)
- Local Nature Reserves (LNR)
- Site of Nature Conservation Importance (SNCI)
- Ancient Semi-Natural Woodland Site (ASNW)
- Planted Ancient Woodland Site (PAWS)
- Ancient Woodland 15m buffer
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- National Park

Map Scale @ A3: 1:270,000





**Table 3.1: Baseline context for Adur, Brighton & Hove, Crawley, Horsham and South Downs National Park**

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
Nature conservation				
<ul style="list-style-type: none"> <li>• 2 Sites of Special Scientific Interest (SSSIs)</li> <li>• 11 Sites of Nature Conservation Interest (SNCIs)</li> <li>• 4 Local Nature Reserves (LNRs)</li> </ul>	<ul style="list-style-type: none"> <li>• 2 SSSIs</li> <li>• 1 SAC</li> <li>• 62 SNCIs</li> <li>• 8 LNRs</li> <li>• 4 Regionally Important Geological Sites (RIGS)</li> </ul>	<ul style="list-style-type: none"> <li>• 12 SNCIs (totalling 329.8 ha)</li> <li>• 6 LNRs (totalling 279.8 ha)</li> <li>• Within 15km of 2 SPAs.</li> </ul>	<ul style="list-style-type: none"> <li>• Approximately 8% of the land area is designated for nature conservation importance.</li> <li>• Arun Valley SPA and RAMSAR Site covers 1% of the District.</li> <li>• 23 SSSIs</li> <li>• 70 SNCIs</li> <li>• 22 RIGS</li> </ul>	<ul style="list-style-type: none"> <li>• 86 SSSIs (covering 6% of the area)</li> <li>• 9 National Nature Reserves (NNRs)</li> </ul>
Landscape				
<ul style="list-style-type: none"> <li>• Just over half of the District is within the South Downs National Park.</li> </ul>	<ul style="list-style-type: none"> <li>• The South Downs National Park covers around 40% of the City.</li> </ul>	<ul style="list-style-type: none"> <li>• The Borough contains no national landscape designations, except a small part of High Weald AONB. As a predominantly urban authority open space plays an important role. There are 32 areas of open space such as parks and nature conservation areas. There are currently</li> </ul>	<ul style="list-style-type: none"> <li>• The District adjoins the South Downs National Park</li> <li>• 22 of the 32 Landscape Character Areas in the District are defined as sensitive to change.</li> </ul>	<ul style="list-style-type: none"> <li>• The open downland has been vulnerable to urban edge pressures extending from the heavily built-up areas and coastal fringe adjoining the National Park housing 1.5 million as well as from the 110,000 people living in the market towns, villages, hamlets and rural areas</li> </ul>

<sup>3</sup> [Sustainability Appraisal \(SA\) and Strategic Environmental Assessment \(SEA\) of the Revised Draft Adur Local Plan 2013](#). September 2013. Adur District Council

<sup>4</sup> [Draft City Plan Part One Sustainability Appraisal](#). 2013. Brighton and Hove City Council.

<sup>5</sup> [Draft Sustainability Report for Consultation with Local Plan Preferred Strategy](#). October 2012. Crawley Borough Council

<sup>6</sup> [Sustainability Appraisal: Environmental Report of the Proposed Submission](#). May 2014. Horsham District

<sup>7</sup> [South Downs National Park Authority Local Plan Sustainability Appraisal Scoping Report](#). June 2012. South Downs National Park Authority.

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
		1.76 ha of park and garden space per 1,000 population in Crawley, which is comparatively high for an English town. <sup>8</sup>		<p>within the NP boundary.</p> <ul style="list-style-type: none"> <li>• Agricultural intensification, particularly since commencement of WWII resulted in an increase in arable and improved grassland crops, and a decline in species rich chalk grassland.</li> </ul>
Heritage				
<ul style="list-style-type: none"> <li>• 7 Conservation Areas</li> <li>• 118 Listed Buildings</li> </ul>	<ul style="list-style-type: none"> <li>• 34 Conservation Areas. 6 are classified as 'At Risk'</li> <li>• Approximately 3,400 Listed Buildings. 477 (14%) listed building are Grades I and II*</li> <li>• 15 Scheduled Monuments</li> <li>• 6 Registered Parks and Gardens</li> </ul>	<ul style="list-style-type: none"> <li>• 11 Conservation Areas</li> <li>• 100 Listed Buildings</li> <li>• 4 Scheduled Monuments</li> </ul>	<ul style="list-style-type: none"> <li>• 1,860 Listed Buildings</li> <li>• 39 Conservation Areas</li> <li>• 77 Scheduled Monuments</li> <li>• 252 Sites of Archaeological Interest</li> </ul>	<ul style="list-style-type: none"> <li>• 152 Grade I Listed Buildings</li> <li>• 221 Grade Ii* Listed Buildings</li> <li>• 4,798 Grade II Listed Buildings</li> <li>• 616 Scheduled Monuments (50 'at risk')</li> <li>• 154 Conservation Areas (9 'at risk')</li> <li>• 30 Registered Parks and Gardens (2 'at risk')</li> <li>• 2 Registered Battlefields</li> </ul>

<sup>8</sup> N.b. This is not an even spread across the Borough, and figure is skewed by the large open space at Tilgate Park. This number is also likely to decrease as the forthcoming Local Plan proposes development on open space.

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
Air and Climate				
<ul style="list-style-type: none"> <li>2 AQMAs (Air Quality Management Areas) at the High Street in Shoreham and the Old Shoreham Road in Southwick.</li> </ul>	<ul style="list-style-type: none"> <li>1 AQMA (Brighton and Portslade AQMA, declared 2013)</li> </ul>	<ul style="list-style-type: none"> <li>There is 1 AQMA in Crawley, and an upward trend of NO<sub>2</sub> concentrations.</li> </ul>	<ul style="list-style-type: none"> <li>2 AQMAs at Cowfold and Storrington.</li> </ul>	<ul style="list-style-type: none"> <li>No AQMAs in the National Park.</li> </ul>
Water				
<ul style="list-style-type: none"> <li>There are 3 water bodies in Adur that are failing to achieve good ecological status as defined by the Water Framework Directive.</li> <li>Significant areas have high flood risk due to the coastal and riverine location of the District.</li> </ul>	<ul style="list-style-type: none"> <li>Per capita water consumption should stabilise over the next few years due to decreasing demands (though for example, water metering) and improvements (i.e. reducing leakage). There will be challenges throughout the plan period to ensure that there is sufficient water to meet demand, although demand is not expected to rise in line with households.</li> <li>Much of the area at risk from tidal flooding is protected by flood defences. However there remains a residual risk that the defences could fail or be overtopped during a</li> </ul>	<ul style="list-style-type: none"> <li>The potential for development to be concentrated in the Crawley area may lead to water supply issues.</li> <li>846 properties are estimated as being at 'significant' risk of flooding (i.e. at risk once in every 100 years or more). A further 59 properties are at 'moderate' risk of flooding. There is a significant problem with surface water flooding.</li> <li>Sewage treatment works are nearing capacity.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 6.5% of the total administrative area of the District is located within the functional floodplain (Flood Zone 3b). This includes 1.18% of existing development. 1.20% of the District is located within high flood risk areas and 0.18% of the District is within moderate flood risk areas.</li> </ul>	<ul style="list-style-type: none"> <li>Pressure from new development and rising household demand is increasing the need for water across the southeast. This is having an impact on the water resources from the South Downs National Park. The level of abstraction, from both the Chalk and Lower Greensand aquifers across the National Park, already exceed the available natural resource (Environment Agency, 2012).</li> </ul>

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
	flood event.			
Soils				
<ul style="list-style-type: none"> <li>There is significant potential for land contamination in the industrial areas of Shoreham and Lancing.</li> </ul>	<ul style="list-style-type: none"> <li>The Council area has 2,863 sites potentially containing contaminated land.</li> </ul>	<ul style="list-style-type: none"> <li>The Agricultural Land Classification (ALC) maps for West Sussex indicate that the agricultural land within Crawley is a mixture of Grades 3 and 4.</li> </ul>	<ul style="list-style-type: none"> <li>Previous industrial uses and activities such as landfill have the potential to result in contaminated land which would need to be investigated and appropriately mitigated before development can take place.</li> </ul>	<ul style="list-style-type: none"> <li>Increased cycles of drought and flooding are projected. This may impact on soil condition with increased erosion and nutrient loss.</li> </ul>
Human Characteristics				
<ul style="list-style-type: none"> <li>Adur has a population of 61,300.</li> <li>As of 2011, 22% of Adur's residents were 65 or over which is similar to the average for the County of West Sussex (21%) but notably higher than the national average (16%).</li> <li>The population of Adur, although increasing relatively slowly, is likely to see a significant increase in the number of elderly due to people generally living longer.</li> <li>The Indices of Multiple</li> </ul>	<ul style="list-style-type: none"> <li>Resident population is 273,400, predicted to increase to 311,000 by 2030.</li> <li>Brighton and Hove has a lower proportion of over 65s than the surrounding districts.</li> <li>Brighton &amp; Hove is ranked as the 66th most deprived authority in England which is an increase on the two previous Index of Multiple Deprivation ranks it attained (meaning deprivation in the District is increased in comparison to other Local Authorities).</li> </ul>	<ul style="list-style-type: none"> <li>Population is estimated at approximately 105,000</li> <li>There is a predicted increase in the number of over 65s</li> </ul>	<ul style="list-style-type: none"> <li>2011 population for the District was 131,301</li> <li>Horsham currently has an ageing population, with a 19.4% of residents at retirement age or above.</li> </ul>	<ul style="list-style-type: none"> <li>The population of the South Downs is predominantly rural with an average population density of 70 people per square kilometre compared to a south east average of 440 people per square kilometre.</li> <li>Those aged 65 and over, account for around 21 per cent compared to 17 per cent in the South East. This age group is also showing the greatest increase.</li> </ul>

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
<p>Deprivation shows that there is some degree of localised deprivation in Adur and, as of 2010, Adur was ranked 135 (out of 354 authorities – 1 being the most deprived) in the Index of Multiple Deprivation making it the most deprived area in West Sussex.</p>				<ul style="list-style-type: none"> <li>Mapping of the indices of multiple deprivation for Health, shows that Urban areas adjacent to the park and within the market towns include pockets of poverty and poor health.</li> </ul>
Roads and Transport				
<ul style="list-style-type: none"> <li>High levels of congestion on the A259 and A27</li> <li>The district is well connected to the strategic road and rail networks between London and the south coast.</li> <li>A significant amount of people that live in Adur commute to work outside of the district. Although there are no up-to-date figures regarding out-commuting, at the time of the 2001 Census only 43.7% of those living in the Adur district who are</li> </ul>	<ul style="list-style-type: none"> <li>The CO2 emissions from road transport are showing a decreasing trend, whilst the number of journeys made by bus are increasing.</li> </ul>	<ul style="list-style-type: none"> <li>High levels of congestion on the M23, A264, A23 and A2220</li> <li>High proportion of journeys made by private car</li> <li>Gatwick Airport lies within the Borough boundary - parts of the Borough are subject to serious noise disturbance from aircraft.</li> </ul>	<ul style="list-style-type: none"> <li>There are capacity and safety issues at Junctions 10 and 11 of the M23.</li> <li>The District has high levels of car ownership and use.</li> <li>The 2011 Census revealed that there has been a slight reduction in the number of people in the District travelling to work by car.</li> <li>Car use in the District is high is a result of limited public transport services.</li> </ul>	<ul style="list-style-type: none"> <li>Car ownership levels are high with 85% of residents owning at least one car and an estimated 63% of the working population travelling to work by car representing 7.76 million two way journeys annually.</li> <li>Approximately 22,500 residents commute out to other destinations in the south east, including London. Peak capacity on rail commuter routes between London and south coast termini such as Brighton, Portsmouth and</li> </ul>

Adur District Council <sup>3</sup>	Brighton and Hove City Council <sup>4</sup>	Crawley Borough Council <sup>5</sup>	Horsham District Council <sup>6</sup>	South Downs National Park Authority <sup>7</sup>
economically active actually worked in the district.				Southampton is an acknowledged problem.
Infrastructure				
<ul style="list-style-type: none"> <li>None identified from review of baseline information</li> </ul>	<ul style="list-style-type: none"> <li>There are not expected to be issues relating to electricity or gas supply</li> </ul>	<ul style="list-style-type: none"> <li>Growth of Gatwick Airport will put pressure on existing infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>None identified from review of baseline information</li> </ul>	<ul style="list-style-type: none"> <li>None identified from review of baseline information</li> </ul>
Economic Characteristics				
<ul style="list-style-type: none"> <li>As of 2011, there were an estimated 21,000 jobs in Adur representing 10% of jobs in the Adur-Worthing-Brighton area and 5% of jobs in West Sussex.</li> <li>As of 2012, 85.5% of the working age population in Adur were economically active which is higher than both the South East figure of 79.6% and the national figure of 76.9% (NOMIS).</li> <li>12.7% still had no qualifications</li> </ul>	<ul style="list-style-type: none"> <li>75.3% of the population (16-74) are economically active (2011).</li> <li>7.7% of the economically active population are unemployed.</li> <li>43% of residents hold a degree level qualification or equivalent.</li> <li>8% of working residents have no qualifications.</li> </ul>	<ul style="list-style-type: none"> <li>76.9% of the population (16-74) are economically active (2011)</li> <li>People of working age with NVQ Level 4 and above – 29.7%</li> <li>People of working age with no qualifications – 11.7%</li> </ul>	<ul style="list-style-type: none"> <li>73.1% of the population (16-74) are economically active (2011).</li> <li>3.6% of individuals classed as economically active are unemployed. This compared with 4.7% in the south east as a whole.</li> </ul>	<ul style="list-style-type: none"> <li>The GVA per capita is £19,450 broadly similar to the South East and well above many parts of the UK. The unemployment rate at 1.6% is well below the national average of 8.3%.</li> </ul>

**Table 3.2: Baseline context for Lewes, Tandridge, Wealden and Worthing**

Lewes District <sup>9</sup>	Tandridge District <sup>10</sup>	Wealden District <sup>11</sup>	Worthing Borough <sup>12</sup>
Nature conservation			
<ul style="list-style-type: none"> <li>• 16 SSSIs</li> <li>• 115 SNCIs</li> <li>• 2 NNRs</li> <li>• 4 LNRs</li> <li>• 3 Wildlife Trust Reserves</li> </ul>	<ul style="list-style-type: none"> <li>• 8 SSSIs</li> <li>• 250 Ancient Woodlands (2 Ha)</li> <li>• 98 SNCIs</li> <li>• 6 LNRs</li> <li>• 167 potential SNCIs</li> <li>• 2 RIGs</li> <li>• SSSI condition: favourable – 39%; unfavourable recovering – 58%; unfavourable no change/ declining/ destroyed - 4% (2009).</li> </ul>	<ul style="list-style-type: none"> <li>• SSSI: 7671 ha (2011)</li> <li>• Area of ancient woodland: 11,836ha or 14.15% of District (2009/10).</li> <li>• LNR: 247 Ha (2011)</li> <li>• New homes built on previously developed land: 59% (2010/11).</li> </ul>	<ul style="list-style-type: none"> <li>• 11 SNCIs</li> <li>• 1 SSSI</li> <li>• 360 hectares of parks and open recreation spaces</li> </ul>
Landscape			
<ul style="list-style-type: none"> <li>• 55% of the District is within the South Downs National Park</li> </ul>	<ul style="list-style-type: none"> <li>• 2 AONBs</li> </ul>	<ul style="list-style-type: none"> <li>• AONB covers 50,648 ha of the District (60.7% of District) (2007).</li> </ul>	<ul style="list-style-type: none"> <li>• Most of the land outside the built up area to the north falls within the South Downs National Park.</li> </ul>
Heritage			
<ul style="list-style-type: none"> <li>• 35 conservation areas totalling 493 hectares.</li> <li>• 1,710 listed buildings.</li> </ul>	<ul style="list-style-type: none"> <li>• 19 Conservation Areas.</li> <li>• Almost 600 listed buildings (Grade 1: 20; Grade 2*: 52; Grade 2: 524).</li> </ul>	<ul style="list-style-type: none"> <li>• 34 Conservation Areas</li> <li>• 5 heritage features at risks (2011).</li> </ul>	<ul style="list-style-type: none"> <li>• 26 conservation areas,</li> <li>• 360 listed buildings</li> <li>• Over 1,000 buildings regarded as being</li> </ul>

<sup>9</sup> [Lewes District Local Plan, Joint Core Strategy – Proposed Submission Document Sustainability Appraisal](#), May 2014, Lewes District Council

<sup>10</sup> [Tandridge District Council Local Development Framework Sustainability Appraisal and Strategic Environmental Assessment](#), December 2009, Tandridge District Council

<sup>11</sup> Appendix B Baseline Update, [Wealden District Council, Local Development Framework Sustainability Appraisal of the Strategic Sites Development Plan Document Scoping Report \(January 2012\)](#), Wealden District Council

<sup>12</sup> [Core Strategy](#), April 2011, Worthing Borough Council. *Unable to locate appropriate SA report/ scoping report for Worthing District data, hence use of Core Strategy.*



Lewes District <sup>9</sup>	Tandridge District <sup>10</sup>	Wealden District <sup>11</sup>	Worthing Borough <sup>12</sup>
	<ul style="list-style-type: none"> <li>• 20 Ancient monuments.</li> <li>• 200 areas of High Archaeological Potential.</li> <li>• Very few are identified as being at risk.</li> </ul>		of important local interest.
Air and Climate			
<ul style="list-style-type: none"> <li>• 1 AQMA in Lewes town centre.</li> <li>• A further AQMA is to be designated in the area of South Way, Newhaven.</li> </ul>	<ul style="list-style-type: none"> <li>• No AQMAs have been designated.</li> </ul>	<ul style="list-style-type: none"> <li>• No AQMAs have been designated.</li> <li>• Carbon Dioxide emissions (tonnes per capita): 6.1 (2009).</li> </ul>	<ul style="list-style-type: none"> <li>• Area around Grove Lodge roundabout (Worthing) is an AQMA.</li> <li>• Carbon Dioxide emissions (tonnes per capita): 5.4 (2006).</li> </ul>
Water			
<ul style="list-style-type: none"> <li>• 11.1% of the District lies within Flood Zone 2, of which 9.9% lies within Flood Zones 3a or 3b.</li> <li>• Significant risk of flooding from inundation by the sea and by the River Ouse.</li> <li>• Water quality in rivers falls well below national average in Environment Agency's categories for assessing water bodies (Biological, Ecological and Physico-Chemical).</li> <li>• Classed as a Water Stressed Area, meaning that prudent use of the District's water resources is sought however water use is higher than the national average.</li> </ul>	<ul style="list-style-type: none"> <li>• 695 properties within Flood Zone 3; 1,314 properties within Flood Zone 2.</li> <li>• 85% of Sutton and East Surrey's water supply comes from groundwater sources.</li> </ul>	<ul style="list-style-type: none"> <li>• 2,359 properties at risk from flooding (2007).</li> <li>• River quality - biological status (as a percentage of river length): high: 0%; good: 21.6%; moderate: 48.5%; poor: 27.2%; bad: 2.7% (2009).</li> <li>• River quality - chemical status: very good: 26%; good: 35.3%; fairly good: 21.8%; fair: 13%; poor: 3.8%; bad: 0% (2006).</li> <li>• Daily domestic water use: 181l per capita consumption (2004) (national: 154.14l).</li> </ul>	<ul style="list-style-type: none"> <li>• 2009 Worthing town's beaches were awarded the highest possible sea water quality by the Marine Conservation Society.</li> <li>• 2009 Worthing town's beach also won a Quality Coast Award for the fourth year running.</li> <li>• Two river flood zones in Worthing: the area of the Ferring Rife to the west of the borough and Teville Stream to the east.</li> <li>• Low-lying areas of the coastal land are susceptible to flooding from the sea.</li> </ul>

Lewes District <sup>9</sup>	Tandridge District <sup>10</sup>	Wealden District <sup>11</sup>	Worthing Borough <sup>12</sup>
Soils			
<ul style="list-style-type: none"> <li>High quality of soil: majority is considered to be "Good to Moderate Quality" (Grade 3) agricultural land.</li> <li>History of heavy industry in the District, particularly in Newhaven. Some contaminated sites exist.</li> </ul>		<ul style="list-style-type: none"> <li>Grade 1 Agricultural land - 136 ha (0.1%); Grade 2 - 4450 ha (2.6%); Grade 3 - 104,140 (60.9%); Poor - 37,618 (22.0%); Very poor - 802 (0.5%)* <ul style="list-style-type: none"> <li>*data taken from overall view of East Sussex</li> </ul> </li> </ul>	
Human Characteristics			
<ul style="list-style-type: none"> <li>Population - 97,500/ 42,200 households.</li> <li>Significantly higher percentage of residents over 65 years of age - 22.8% (2012).</li> <li>Population in bad/ very bad health - 5.7%. (2011)</li> <li>Life expectancy; Males: 81.0 females: 85.1 (2012).</li> <li>2009/10 statistics show that there were 49.17 crimes recorded per 1000 residents (significantly lower than national level).</li> <li>The 2010 Index of Multiple Deprivation revealed that Lewes District is the 179<sup>th</sup> (out of 326) most deprived local authority.</li> </ul>	<ul style="list-style-type: none"> <li>Population - 79,000 (2001).</li> <li>Households to increase by 2,400 between 2006-2026.</li> <li>General health of the District's population is good, with a high life expectancy.</li> <li>Predicted change in demographics: number of children 0-14 declining, number of people 20 - 54 declining, number over 55 increasing significantly.</li> <li>Out of 354 districts in England, Tandridge is one of the least deprived, being ranked at 323.</li> </ul>	<ul style="list-style-type: none"> <li>Homeless households accepted to be in priority need - 32 (2010/2011).</li> <li>Housing deemed unfit- 1.1% (2006).</li> <li>Life expectancy: male: 80.3 female: 83.5 (2008-10).</li> <li>Households with people with limiting long term illness: 31% (2001).</li> <li>Crime per 1000 persons: burglary - 1.0; violence against person: 5.6; motor theft: 0.8 (2009/10).</li> <li>Wealden is ranked 250 out of 354 Districts in terms of deprivation however deprivation seems to be increasing in the District.</li> </ul>	<ul style="list-style-type: none"> <li>Population mid-2007 was 99,600. (2011 ONS census data not in Core strategy; population - 104,640)</li> <li>Over-75 population percentage of total population is significantly higher than the South East region. (2011 ONS census data not in Core Strategy; 75+ population - 10,367)</li> <li>However over-65 has seen a decline of 8% in the last 20 years.</li> <li>Worthing ranks 172 out of 354 local authorities in terms of most deprived areas.</li> </ul>

Lewes District <sup>9</sup>	Tandridge District <sup>10</sup>	Wealden District <sup>11</sup>	Worthing Borough <sup>12</sup>
Roads and Transport			
<ul style="list-style-type: none"> <li>High levels of congestion on the A259, A27 and the A26.</li> <li>Lewes, Newhaven and Seaford linked by rail connections to London and Gatwick and towns along the Sussex coast and beyond. Port of Newhaven provides cross channel passenger and freight services to Dieppe in France</li> </ul>	<ul style="list-style-type: none"> <li>Rail services from the larger built up areas and a number of the settlements to London.</li> <li>The District is crossed by the Redhill to Tonbridge line</li> <li>District is also crossed by the M25 and M23 motorways</li> <li>Gatwick Airport lies just over the District boundary to the south-west - parts of the District are subject to serious noise disturbance from aircraft.</li> </ul>	<ul style="list-style-type: none"> <li>Travel to work by mode - private motor: 69.2%; public transport: 8%; foot/cycle: 8.6% (2001)</li> <li>Access to services and facilities by public transport, walking and cycling – 49% (2009).</li> </ul>	<ul style="list-style-type: none"> <li>Car ownership slightly higher than the national average: Worthing particularly congested along the northern edge of the A27. A259 also congested.</li> <li>Over 15% of the working population travel more than 15 miles to work.</li> <li>5 railway stations in the borough and public transport service is considered to be relatively good.</li> </ul>
Infrastructure			
<ul style="list-style-type: none"> <li>None identified from review of baseline information</li> </ul>	<ul style="list-style-type: none"> <li>None identified from review of baseline information'</li> </ul>	<ul style="list-style-type: none"> <li>Satisfaction with local bus services – satisfied: 35%; dissatisfied: 29% (2008/09)</li> </ul>	<ul style="list-style-type: none"> <li>None identified from review of baseline information</li> </ul>
Economic Characteristics			
<ul style="list-style-type: none"> <li>Unemployment levels at 5.6% in January 2014.</li> <li>Dec 2011 House prices to earnings ratio- 8.20:1</li> <li>March 2014 median house price £231,995 (national £190,000).</li> <li>37.3% of those in Lewes are qualified to degree level.</li> <li>11.6% of those in Lewes have no qualifications.</li> </ul>	<ul style="list-style-type: none"> <li>Around 4,000 businesses in the District.</li> <li>Net out-commuting figure of 10,000 people per day contributing significantly to the economic and commercial activity in London and other centres.</li> <li>Unemployment at 5.9% (December 2008).</li> </ul>	<ul style="list-style-type: none"> <li>Unemployed: 3.8% of the economically active population (2010/11).</li> <li>Self-employed: 16.3% of the economically active population (2010/11).</li> <li>Net outward commuting flow of 17,522 (2001).</li> <li>People of working age with no qualifications 11.7%</li> </ul>	<ul style="list-style-type: none"> <li>The ratio of house prices to incomes is high in regional terms.</li> <li>Unemployment: 3.9% (2009). <i>(2011 ONS census data not in Core strategy; unemployment – 3.5%)</i></li> <li>Worthing has experienced a lower enterprise 'start-ups' rate compared to the</li> </ul>

Lewes District <sup>9</sup>	Tandridge District <sup>10</sup>	Wealden District <sup>11</sup>	Worthing Borough <sup>12</sup>
	<ul style="list-style-type: none"> <li>• Most of the workforce has entered further education of some kind.</li> </ul>	<p>(2010).</p> <ul style="list-style-type: none"> <li>• House price to income ratio 2010 – 8.56:1.</li> <li>• Employment in mining, agricultural or fishing: 100 (2010).</li> <li>• Tourism business income: £261 million (2008).</li> <li>• Jobs in tourism: 4,600 (10.2% of employee jobs in 2008).</li> <li>• New businesses registration rate 58.6% (2009).</li> <li>• Small businesses showing growth; 13% (2007/08).</li> <li>• Employment in knowledge sectors: 30.3% (2008).</li> <li>• NVQ Level 4 qualifications and above - 29.7% (2010)</li> </ul>	<p>regional and national average.</p> <ul style="list-style-type: none"> <li>• Economy is dominated by the service sector which employs over 88% of the work-force.</li> </ul>



## 4 Options development

### Unmet housing need of neighbouring authorities

- 4.1 Using data provided by neighbouring authorities, **Table 4.1** sets out the objectively assessed housing need (OAN) per authority, how much housing each authority is planning to provide in their current plan, and by difference the amount of unmet housing need per annum. These figures are then extrapolated to give an indicative estimate of the unmet need of each authority over a period of 2011-2031 (note that each authority is working to a different plan period, however, on average, 2011-2031 covers them all).
- 4.2 The authorities of Brighton and Hove, Adur, Worthing, Tandridge, Lewes and Wealden returned responses to MSDC's proforma request for information circulated in early August 2014. Crawley District had already sent its own Duty to Cooperate letter to its neighbours (including Mid Sussex) setting out its unmet housing need requirements and requesting help from its neighbours in identifying land for its unmet housing need. Although a neighbour to the west of Mid Sussex, Horsham District does not have any unmet need and thus assessment of options involving Horsham has not been necessary.
- 4.3 **Table 4.1** sets out the total unmet need for each neighbouring authority per annum and extrapolated over the plan period (2011-2031), but it should be noted that the neighbouring authorities are not necessarily requesting that MSDC meets all of this unmet need, as other authorities may also be able to accommodate some of their unmet need. To date, no authority has set out an exact figure of the amount of need they will be expecting Mid Sussex to accommodate.
- 4.4 In addition, some authorities noted that provision for their unmet housing need might not be required until later in the plan period, e.g. Adur District suggested its unmet need would be more likely from 2026-2031, Crawley from year 6 (2021) onwards; while other authorities considered their additional housing need would be more likely earlier in the plan period (e.g. Worthing and Lewes) and/or ongoing throughout the plan period.

**Table 4.1: Unmet housing need of neighbouring authorities of Mid Sussex**

Local authority	Objectively Assessed Need per annum (pa)	Supply proposed in most recent Local Plan documents <sup>13</sup> (pa)	Unmet need (pa)	Extrapolated unmet need 2011-2031 (i.e. x 20)
<b>Mid Sussex</b>	<b>516<sup>14</sup></b>	tbc	tbc	tbc
Adur (1)	240	182	58	1,160
Brighton & Hove (1)	1,200	660	540	10,800
Crawley (1) and (4)	535	326	209	4,173
Horsham (2)	560	650	-90	0 (as Horsham has no unmet need)
Lewes (2)	490	280	210	4,200
South Downs NPA (3)	0	0	0	0

<sup>13</sup> Supply does not take into account under or over delivery

<sup>14</sup> MSDC is still finalising its Objectively Assessed Need, therefore this figure is indicative at this stage.

Local authority	Objectively Assessed Need per annum (pa)	Supply proposed in most recent Local Plan documents <sup>13</sup> (pa)	Unmet need (pa)	Extrapolated unmet need 2011-2031 (i.e. x 20)
Tandridge (1) and (5)	454	125	329	6,580
Wealden (1)	616	450	166	3,320
Worthing (1), (2) and (6)	600	225	375	7,500
<b>Total</b>	<b>4,695</b>	<b>2,898</b>	<b>1,797</b>	<b>37,733</b>

Notes:

(1) Data returned by LPA to MSDC's request for information in August 2014.

(2) Housing requirements set out in most recent Local Plan documents.

(3) For the purpose of this study it has been assumed that the entire SDNPA housing requirement is included within the housing figures of its constituent LPAs.

(4) Crawley's unmet need figure was for the period 2015-2030, so it has been extrapolated over 20 years to fit the average plan period used in this study of 2011-2031.

(5) The number for Tandridge is to be confirmed. The number presented here is derived from initial work and therefore does not set the OAN as it was not derived from a full SHMA and did not take into account the deficiencies in the 2011 ONS figures or adequately reflect local circumstances.

(6) The number of Worthing has not yet been tested. The Council is committed to a full plan review and will consider the amount of additional houses that can be planned for, which will in turn influence the level of shortfall.

## Potential distribution of unmet housing need

- 4.5 Mid Sussex District has various environmental and infrastructure constraints to development, which were examined in more detail within the Mid Sussex Capacity Study. In particular, the national level landscape designations of the High Weald Area of Outstanding Natural Beauty and the South Downs National Park cover around two thirds of the district and are a primary constraint to housing development. Whilst limited development could occur in the AONB, it is not likely to be appropriate for large-scale strategic development to be developed here. The National Park, whilst within Mid Sussex, is not within the District Plan plan area (as the South Downs National Park Authority is responsible for producing a Local Plan for the National Park). As a result, the two main areas where unmet housing need for other authorities could be accommodated are to the north of the High Weald AONB or to the south of the AONB/north of the National Park.
- 4.6 Due to the relative locations of Mid Sussex's neighbours, it is considered likely that if their unmet need were to be delivered within Mid Sussex, it would need to be delivered in one or both of these broad locations. **Table 4.2** shows a potential geographical split of where the unmet housing need of neighbouring authorities would be most appropriately delivered in Mid Sussex, based on existing and likely future links (e.g. employment/migration) and geographic location. These assumptions about where unmet need might be delivered for each neighbouring authority were drawn on when characterising all the options in order to help identify what the sustainability impacts of each option might be. The potential geographical split is intended to be indicative only for the purposes of analysis of the likely effects.

**Table 4.2: Likely geographical locations of housing provision for each neighbouring authority**

Neighbouring authority	North of AONB	South of AONB/ North of SDNP
Adur	-	100%
Brighton & Hove	-	100%
Crawley	60%	40%
Horsham	-	-
Lewes	-	100%
Tandridge	100%	-
Wealden	75%	25%
Worthing	-	100%

## Options for meeting some or all of all neighbours' unmet needs

- 4.7 Two initial options were identified for meeting all or some of the additional housing requirement of the seven neighbouring authorities with unmet need: **Option 1** meeting 100% of all neighbours' unmet needs within Mid Sussex, or **Option 2** meeting 50% of all neighbours' unmet needs.
- 4.8 However, it is recognised that 100% and 50% are arbitrary figures and not necessarily achievable. Therefore, further options were considered in relation to past migration patterns and travel to work data, to gain a realistic picture of recent population flows between Mid Sussex and its neighbours.

## Meeting unmet housing need based on commuting patterns

- 4.9 Using the data on travel to work patterns from the 2011 Census<sup>15</sup>, **Table 4.3** presents the number of in-commuters into Mid Sussex from its neighbouring authorities. In order to develop an option based on commuting patterns (**Option 3**), the number of in-commuters was considered as a proxy for the number of households that may be looking to move to Mid Sussex if housing provision were to be made there (i.e. 1 in-commuter would equal 1 new household). The third column in Table 4.3 shows the percentage of the neighbouring authorities' unmet housing need that would be covered if the number of in-commuters is used to determine how much unmet need might be delivered in Mid Sussex. This shows that around two thirds of Crawley and Wealden's unmet need would be provided in Mid Sussex, with about half of Lewes and Adur's need, a third of Brighton & Hove's but less than 15% of Tandridge and Worthing's. It should be noted that this analysis addresses in-commuting to mid-Sussex only. It does not take into account that some residents of mid-Sussex also commute out to neighbouring authorities.
- 4.10 The last two columns in Table 4.3 show the indicative north/south split of where that number of housing might be delivered within Mid Sussex based on the assumptions in Table 4.2.

<sup>15</sup> <http://www.ons.gov.uk/ons/rel/census/2011-census/origin-destination-statistics-on-migration--workplace-and-students-for-local-authorities-in-the-united-kingdom/index.html>



**Table 4.3: Number of in commuters to Mid Sussex from surrounding authorities**

Option 3: TTW (In-commuters) 2011 Census*	Nos. of in-commuters 2011	% of unmet need by LPA	South of AONB / North of SDNP	North of AONB
Brighton & Hove	4,008	37.0%	4,008	0
Crawley	2,651	63.5%	1,060	1,591
Wealden	2,375	71.5%	594	1,781
Lewes	2,131	50.7%	2,131	0
Horsham	2,011	N/A	0	0
Tandridge	940	14.3%	0	940
Adur	779	67.2%	779	0
Worthing	688	9.2%	688	0
<b>Total</b>	<b>15,583</b>	<b>N/A</b>	<b>9,260</b>	<b>4,312</b>

## Meeting unmet housing need based on past migration patterns

- 4.11 The data in **Table 4.4** is derived from the ONS 'Migration within the UK' datasets<sup>16</sup>, and illustrates the movement patterns between Mid Sussex and its neighbouring authorities between 2002–2013, referred to as 'internal migration'. In order to develop an option based on past migration patterns (**Option 4**), the net number of people migrating into Mid Sussex was considered as a proxy for the number of households that may be looking to move to Mid Sussex if housing provision were to be made there (i.e. 1 net in-migrant would equal 1 new household). The third column in Table 4.4 shows the percentage of the neighbouring authorities' unmet housing need that would be covered if the number of in-migrants were to be used to determine how much unmet need should be delivered in Mid Sussex. Note that there was net out-migration from Mid Sussex to four of its neighbours (Worthing, Horsham, Lewes and Wealden) between 2002–2013. Therefore, under this option based on past migration, none of these four authorities' unmet need would require to be provided for within Mid Sussex, while less than a third (between 3–30%) of the remaining four authorities' unmet need would require to be provided within Mid Sussex (Brighton & Hove, Crawley Tandridge and Adur).
- 4.12 The last two columns in Table 4.4 show the north/south split of where that number of housing for Brighton & Hove, Crawley Tandridge and Adur might be delivered within Mid Sussex.
- 4.13 It should be noted that past migration trends and the numbers used for this scenario are likely to be a 'minimum' number but provide a good indication of previous trends for modelling purposes. If demographic needs in neighbouring areas remain unmet, net migration to areas such as Mid Sussex may increase (although only if the supply of housing accommodates this).

<sup>16</sup> <http://www.ons.gov.uk/ons/taxonomy/index.html?nsc1=Migration+within+the+UK#tab-data-tables>

**Table 4.4: Level of Net Internal Migration between Mid Sussex and neighbouring authorities**

Option 4: Internal Migration 2002-2013*	Total net migration numbers 2002-2013 between named authority and Mid Sussex	% of unmet need by LPA	South of AONB/ North of SDNP	North of AONB
Brighton & Hove	2,220	20.6%	2,220	0
Crawley	1,240	29.7%	496	744
Tandridge	650	9.9%	0	650
Adur	30	2.6%	30	0
Worthing	-70	-0.9%	0	0
Horsham	-320	N/A	0	0
Lewes	-380	-9.0%	0	0
Wealden	-930	-28.0%	0	0
<b>Total</b>	<b>2,440</b>	<b>N/A</b>	<b>2,746</b>	<b>1,394</b>

## Options for meeting individual neighbour's needs

4.14 To keep the number of options assessed manageable, three scenarios were used to form three potential options for each of the neighbouring authorities. These options were based on the following scenarios:

- **High Level:** Meeting 100% of the neighbour's unmet needs.
- **Mid-Level:** Meeting the percentage of unmet needs of the neighbour based on in commuting (as this provides a mid-point between meeting 100% needs and a lower figure)<sup>17</sup>.
- **Low-Level:** Meeting the percentage of unmet needs of the neighbour based on past migration patterns.

## Summary of options assessed

4.15 **Table 4.5** provides a summary of all the options developed using the approach and assumptions described above. The table shows the total number of homes that would need to be provided in Mid Sussex under each option, as well as the north/south split within Mid Sussex where this development would be likely to be located. Further consideration on the possible locations where development might need to be accommodated in Mid Sussex under each option is explained below.

<sup>17</sup> For Tandridge and Worthing, the in-commuting figure is very close to the in-migration figure so there would be no discernible difference between appraisals of the mid-level option and the low-level option, therefore, 50% has been used as a mid-level figure for these two LPAs).

**Table 4.5: Total number of additional homes to be accommodated in Mid Sussex under each option**

Options	Total	Nos. dwellings South of AONB/ North of SDNP	Nos. dwellings North of AONB
1. Meet full unmet need of all LPAs	37,733	26,413	11,320
2. Meet 50% unmet need of all LPAs	18,367	13,580	5,787
3. Meet all unmet need based on travel to work data	13,572*	9,260	4,312
4. Meet all unmet need based on internal migration data	4,140*	2,746	1,394
5. Meet all Adur's unmet need	1,160	1,160	0
6. Meet Adur's unmet need based on travel to work data	779	779	0
7. Meet Adur's unmet need based on Internal Migration data	30	30	0
8. Meet all Brighton & Hove's unmet need	10,800	10,800	0
9. Meet Brighton & Hove's unmet need based on travel to work data	4,008	4,008	0
10. Meet Brighton & Hove's unmet need based on Internal Migration data	2,220	2,220	0
11. Meet all Crawley's unmet need	4,173	1,669	2,504
12. Meet Crawley's unmet need based on travel to work data	2,651	1,060	1,591
13. Meet Crawley's unmet need based on Internal Migration data	1,240	496	744
14. Meet all Lewes's unmet need	4,200	4,200	0
15. Meet Lewes's unmet need based on travel to work data	2,131	2,131	0
16. Meet Lewes's unmet need based on Internal Migration data	-380	-380	0
17. Meet all Tandridge's unmet need	6,580	0	6,580
18. Meet 50% of Tandridge's unmet need	3,290	0	3,290
19. Meet Tandridge's unmet need based on Internal Migration data	650	0	650
20. Meet all Wealden's unmet need	3,320	830	2,490
21. Meet Wealden's unmet need based on travel to work data	2,375	594	1,781
22. Meet Wealden's unmet need based on Internal Migration data	-930	-233	-698
23. Meet all Worthing's unmet need	7,500	7,500	0
24. Meet 50% of Worthing's unmet need	3,750	3,750	0
25. Meet Worthing's unmet need based on Internal Migration data	-70	-70	0

\* Note that the total figure for Option 3 excludes Horsham's in-commuters, and the total figure for Option 4 excludes the out-migration figures for Worthing, Horsham, Lewes and Wealden.

## Potential broad locations where unmet housing need would be likely to be accommodated

- 4.16 The indicative areas where development for a neighbouring authority is likely to be accommodated is dependent on the location of the neighbouring authority in relation to Mid Sussex's boundary and the strength of current transportation links with Mid Sussex.
- 4.17 For the purpose of assessing the options, eleven 'broad locations', where new housing development could potentially be located have been identified using information from the Capacity Study and Mid Sussex District Council. These are broadly the most sustainable locations for development identified in the Capacity Study (i.e. locations without significant constraints to development and with existing access to services and facilities). These broad locations either surround existing settlements or relate to potential areas for development identified through developer interest (e.g. the potential new settlement in the vicinity of Sayers Common).
- 4.18 These broad locations are generally located to the north of the High Weald AONB, or to the south of the High Weald AONB/north of the South Downs National Park and are as follows:

### North of the High Weald AONB

- Around Copthorne
- Around Crawley Down
- East of Crawley
- South of Crawley
- Around East Grinstead

### South of the High Weald AONB/North of South Downs National Park

- Around Haywards Heath/Lindfield
  - Around Burgess Hill
  - Around Cuckfield
  - Around Bolney
  - Around Hurstpierpoint/Hassocks
  - New Settlement near Sayers Common
- 4.19 Following discussion with MSDC, the most likely suitable broad locations within the north/south wider areas for each neighbour were identified to reflect the differing needs of each of the neighbouring authorities. These are presented for each of the 25 options in **Table 4.6** and on the maps in **Figures 4.1 to 4.8**. Assumptions regarding the most suitable broad locations for each neighbouring authority are noted below. A brief sustainability assessment of the potential for effects of any additional housing development at the eleven broad locations is provided in **Appendix 1**.

### Adur

- 4.20 Adur's unmet housing need would be more likely to be located across the south of Mid Sussex, based on the following:
- Train link between Adur and Haywards Heath (less regular than the main London – Brighton line). Provides a commuting link between these areas, but not as strong compared to Brighton.
  - No strong commuting link between Adur and the northern part of Mid Sussex.
  - No strong migration link between the two authorities.

- Likely that any migration/commuting between the two would be short distance for these reasons, i.e. in the southern part of the district (south of the AONB).

### **Brighton and Hove**

4.21 Brighton and Hove's unmet housing need would be more likely to be located across the south of Mid Sussex based on the following:

- Strong commuting links between the two authorities, although due to transport links these are predominantly between the southern areas of Haywards Heath/Burgess Hill/Hassocks and surrounding villages.
- High migration levels between the two authorities.
- No direct train link between Brighton and East Grinstead/surround areas making travel between the two more difficult, therefore no obvious link.
- Distance between Brighton and northern part of the District (north of the AONB) means there is less of a link.

### **Crawley**

4.22 Crawley's unmet housing need would be more likely to be located in both the north and south based on the following (an assumption of 60% in the north, 40% in the south has been applied to reflect Crawley's location to the north of the District):.

- Links with the East Grinstead / Copthorne / Crawley Down area due to easy vehicle access via A264 and A22. Residents based in these areas are likely to be employed in the Crawley area / Gatwick Airport.
- Train link between Three Bridges and Balcombe/Haywards Heath/Burgess Hill/Hassocks. Access through the District via the A23.
- Strong commuting links between the two authorities.
- High migration levels between the two authorities.

### **Lewes**

4.23 Lewes's unmet housing need would be more likely to be located in the south east area of Mid Sussex (excluding the new settlement at Sayer's Common) based on the following:

- Direct train link between Lewes and Haywards Heath and Burgess Hill (Wivelsfield).
- Lewes District boundary abuts the built up areas of Haywards Heath and Burgess Hill – village of Wivelsfield Green close to these settlements.
- No obvious travel/commuting link between Lewes District and the northern half of Mid Sussex (north of the AONB).
- No direct route (train/road) between Lewes District and likely area for a New Settlement (Sayers Common), plus distance makes this area less likely to accommodate Lewes development needs.

### **Tandridge**

4.24 Tandridge's unmet housing need would be more likely to be located in the north of Mid Sussex, based on the following:

- Tandridge District boundary abuts the built up areas of East Grinstead and Copthorne.
- Train link between Tandridge settlements (e.g. Oxted/Lingfield) and East Grinstead provides a commuting link.
- No obvious travel/commuting link between Tandridge District and the southern half of Mid Sussex (south of the AONB), plus distance makes this area less likely to accommodate Tandridge development needs.
- Relatively low levels of migration between the authorities.

## Wealden

- 4.25 Wealden's unmet housing need would more likely be located in both the north and south, based on the following (an assumption of 75% in the north, 25% in the south has been applied to reflect Wealden's location to the north east of the district):
- No direct train link between the two authorities.
  - Relatively strong commuting link between the two authorities. This is likely to be by road.
  - Main road links are A272 between Uckfield/Haywards Heath in the southern part of the District (south of AONB) and A22 between Forest Row and East Grinstead (north of AONB).
  - Link in the north of the District between Forest Row and East Grinstead – although Forest Row is a small settlement, meaning the main link is likely to be between the larger town of Uckfield and Haywards Heath area.

## Worthing

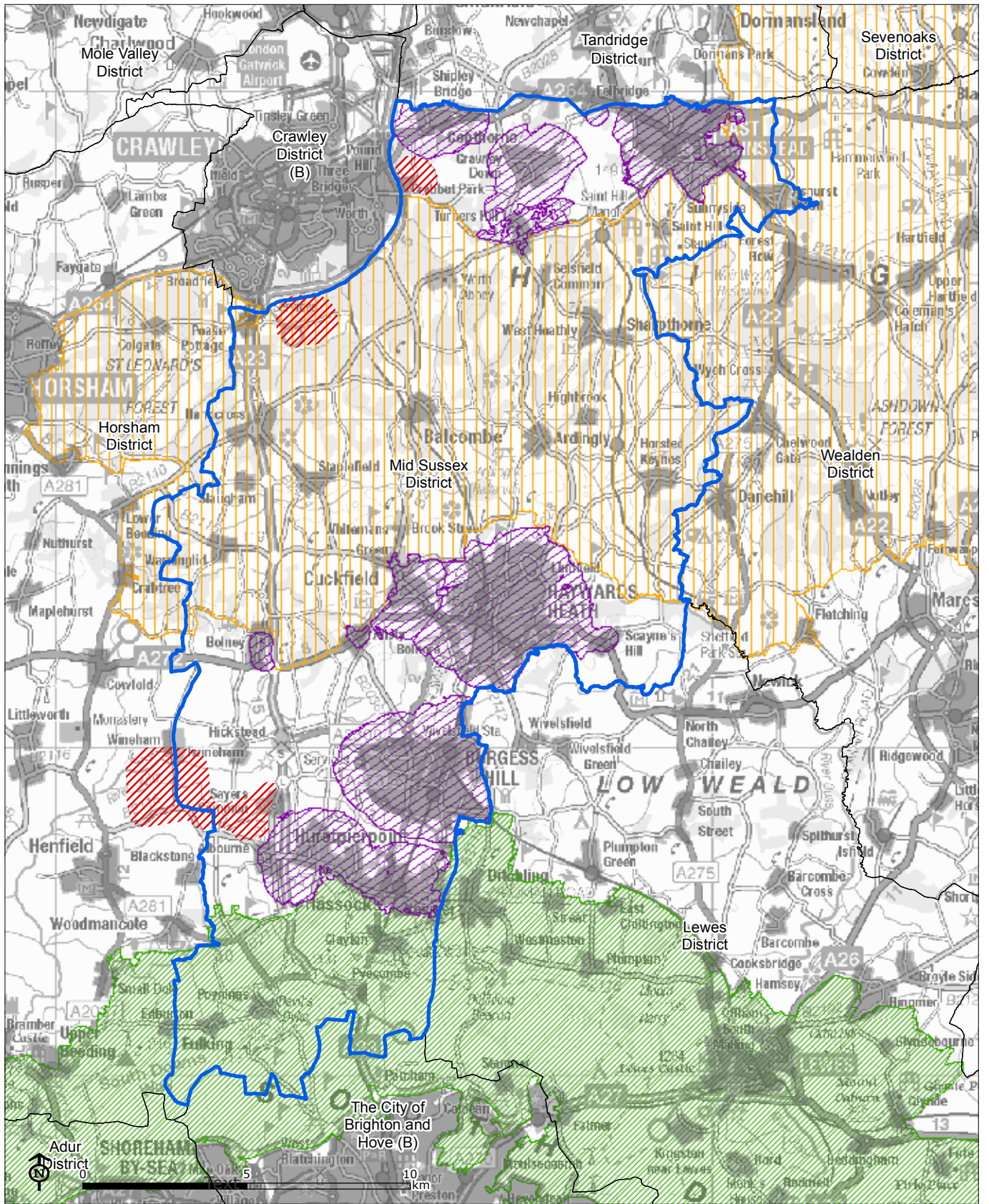
- 4.26 Worthing's unmet housing need would be more likely to be located across the south of Mid Sussex based on the following:
- Train links between Worthing and Haywards Heath (less regular than the main London – Brighton line) provide a commuting link between these areas, but not a strong one compared to Brighton.
  - No strong commuting link between Worthing and the northern part of Mid Sussex.
  - No strong migration link between the two authorities.
  - Likely that any migration/commuting between the two would be short distance for these reasons, i.e. in the southern part of the district (south of the AONB).

**Table 4.6: Broad locations where development might be located under the 25 options for meeting all or some of neighbouring authorities' unmet housing need**

Options	1 – All neighbours' unmet need	2 – 50% neighbours' unmet need	3 – All unmet need based on TTW	4 – All unmet need based on Migration	5 – Adur: All unmet need	6 - Adur: Unmet need: Travel to work	7 – Adur: Unmet need: Migration	8 – Brighton & Hove: All unmet need	9 – B&H: Unmet need: Travel to work	10 – B&H: Unmet need: Migration	11 – Crawley: All unmet need	12 – Crawley: Unmet need: Travel to work	13 – Crawley: unmet need: migration	14 – Lewes: All unmet need	15 – Lewes: Unmet need: Travel to work	16 – Lewes: Unmet need: Migration	17 – Tandridge: All unmet need	18 – Tandridge: 50% unmet need	19 – Tandridge: Unmet need: migration	20 – Wealden: All unmet need	21 – Wealden: Unmet need: Travel to work	22 – Wealden: Unmet need: migration	23 – Worthing: All unmet need	24 – Worthing: 50% unmet need	25 – Worthing: Unmet need: migration	
<b>North of AONB</b>																										
Around Copthorne	✓	✓	✓	✓							✓	✓	✓				✓	✓	✓	✓	✓	✓				
Around Crawley Down	✓	✓	✓	✓							✓	✓	✓				✓	✓	✓	✓	✓	✓				
East of Crawley	✓	✓	✓	✓							✓	✓	✓				✓	✓	✓	✓	✓	✓				
South of Crawley	✓	✓	✓	✓							✓	✓	✓							✓	✓	✓				
Around East Grinstead	✓	✓	✓	✓							✓	✓	✓				✓	✓	✓	✓	✓	✓				
<b>South of AONB/North of SDNPA</b>																										
Around Haywards Heath	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓
Around Burgess Hill	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓							✓	✓	✓	✓

Options	1 – All neighbours' unmet need	2 – 50% neighbours' unmet need	3 – All unmet need based on TTW	4 – All unmet need based on Migration	5 – Adur: All unmet need	6 – Adur: Unmet need: Travel to work	7 – Adur: Unmet need: Migration	8 – Brighton & Hove: All unmet need	9 – B&H: Unmet need: Travel to work	10 – B&H: Unmet need: Migration	11 – Crawley: All unmet need	12 – Crawley: Unmet need: Travel to work	13 – Crawley: unmet need: migration	14 – Lewes: All unmet need	15 – Lewes: Unmet need: Travel to work	16 – Lewes: Unmet need: Migration	17 – Tandridge: All unmet need	18 – Tandridge: 50% unmet need	19 – Tandridge: Unmet need: migration	20 – Wealden: All unmet need	21 – Wealden: Unmet need: Travel to work	22 – Wealden: Unmet need: migration	23 – Worthing: All unmet need	24 – Worthing: 50% unmet need	25 – Worthing: Unmet need: migration	
Around Cuckfield	✓	✓	✓	✓							✓	✓	✓	✓	✓	✓				✓	✓	✓				
Around Bolney	✓	✓	✓	✓							✓	✓	✓	✓	✓	✓										
Around Hurstpier point	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓								✓	✓	✓
New settlement/ Sayers Common	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓										✓	✓	✓	





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- Locations put forward to the District Council for development
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

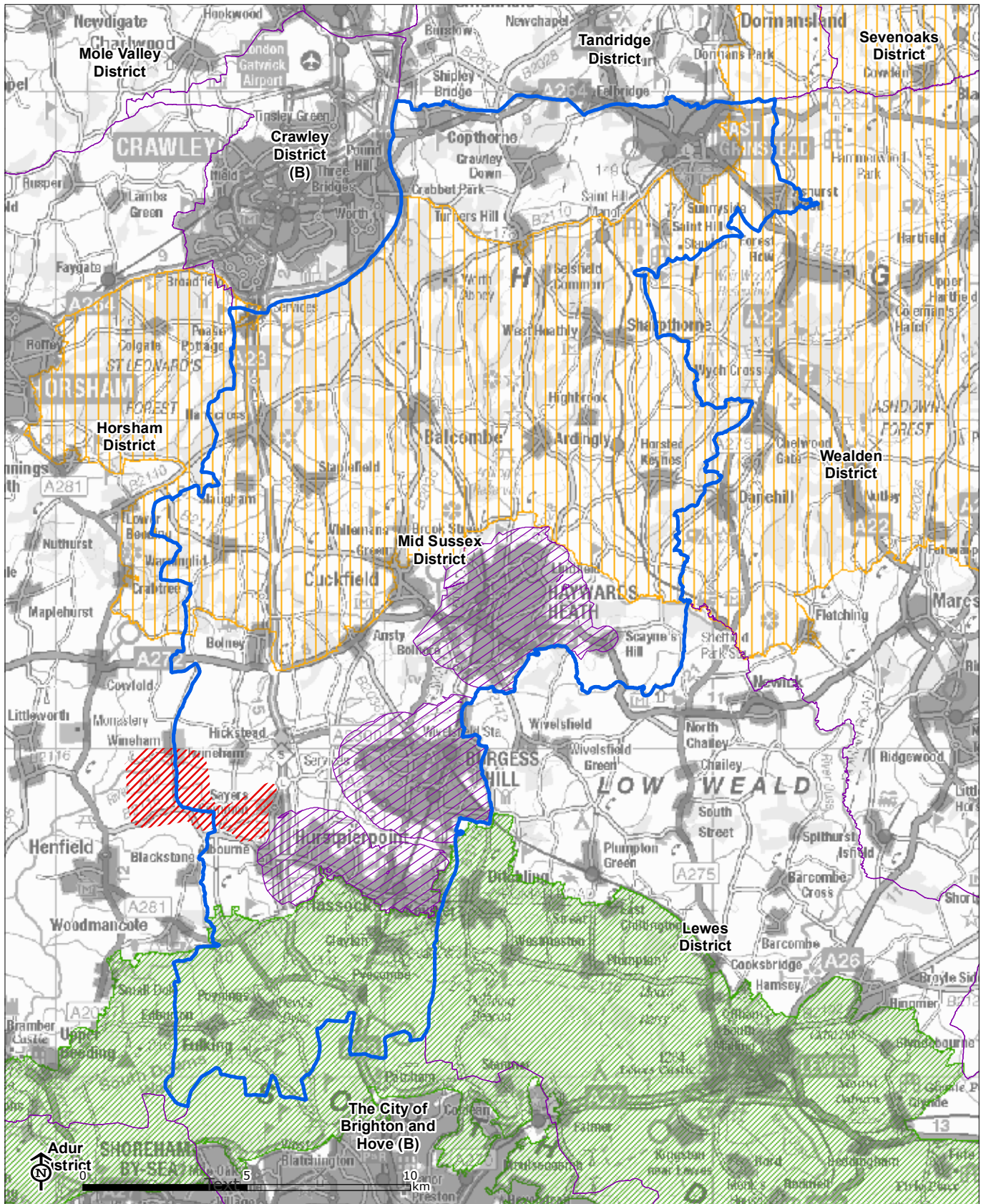
**Figure 4.1: Options 1 to 4 (provision of some or all of the unmet need for all or a combination of neighbours)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- Locations put forward to the District Council for development
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

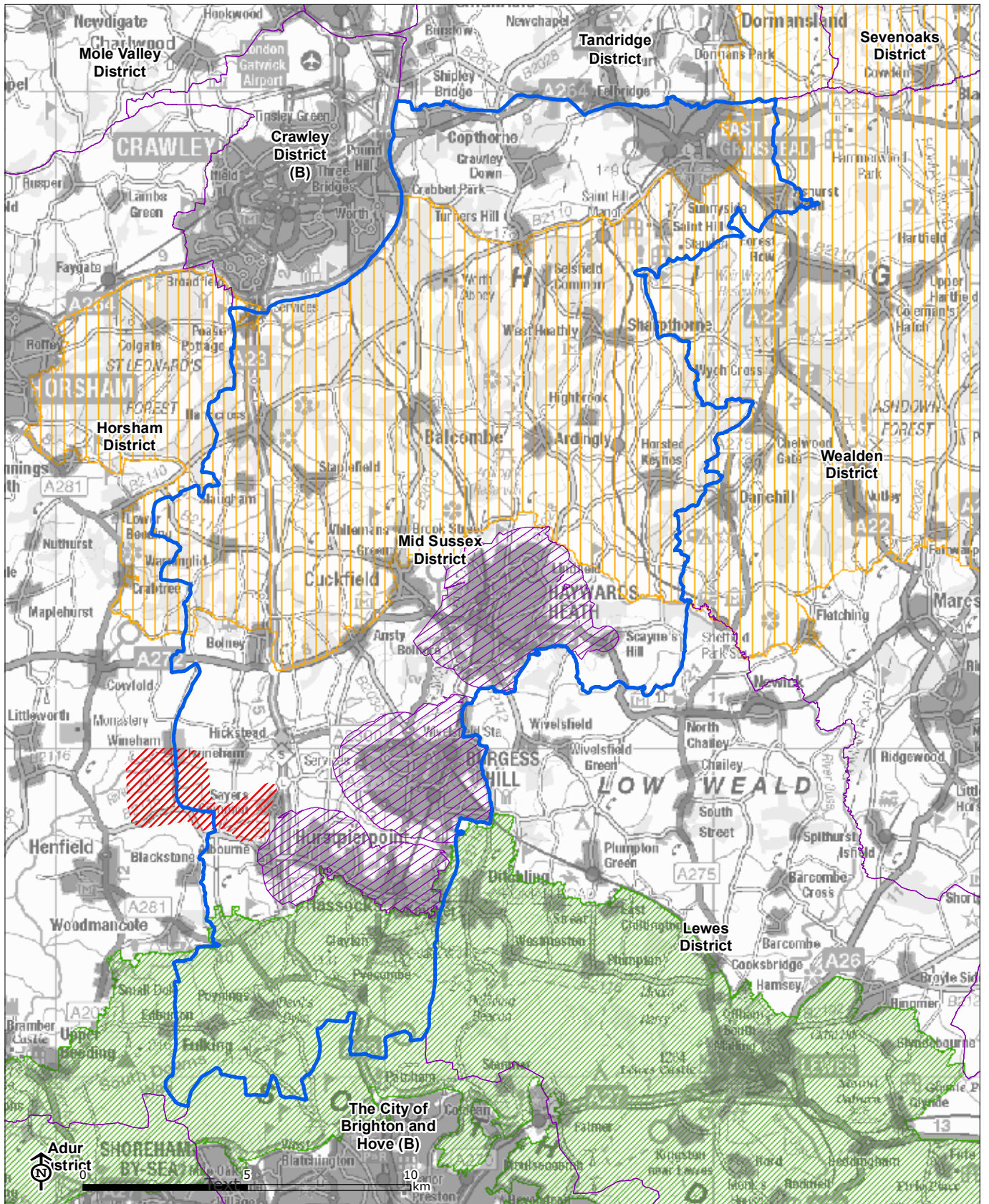
**Figure 4.2: Options 5 to 7 (provision of some or all of the unmet housing requirement for Adur District)**

Source: MSDC, Natural England, OS.



**Map Scale @ A4: 1:165,000**





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- Locations put forward to the District Council for development
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

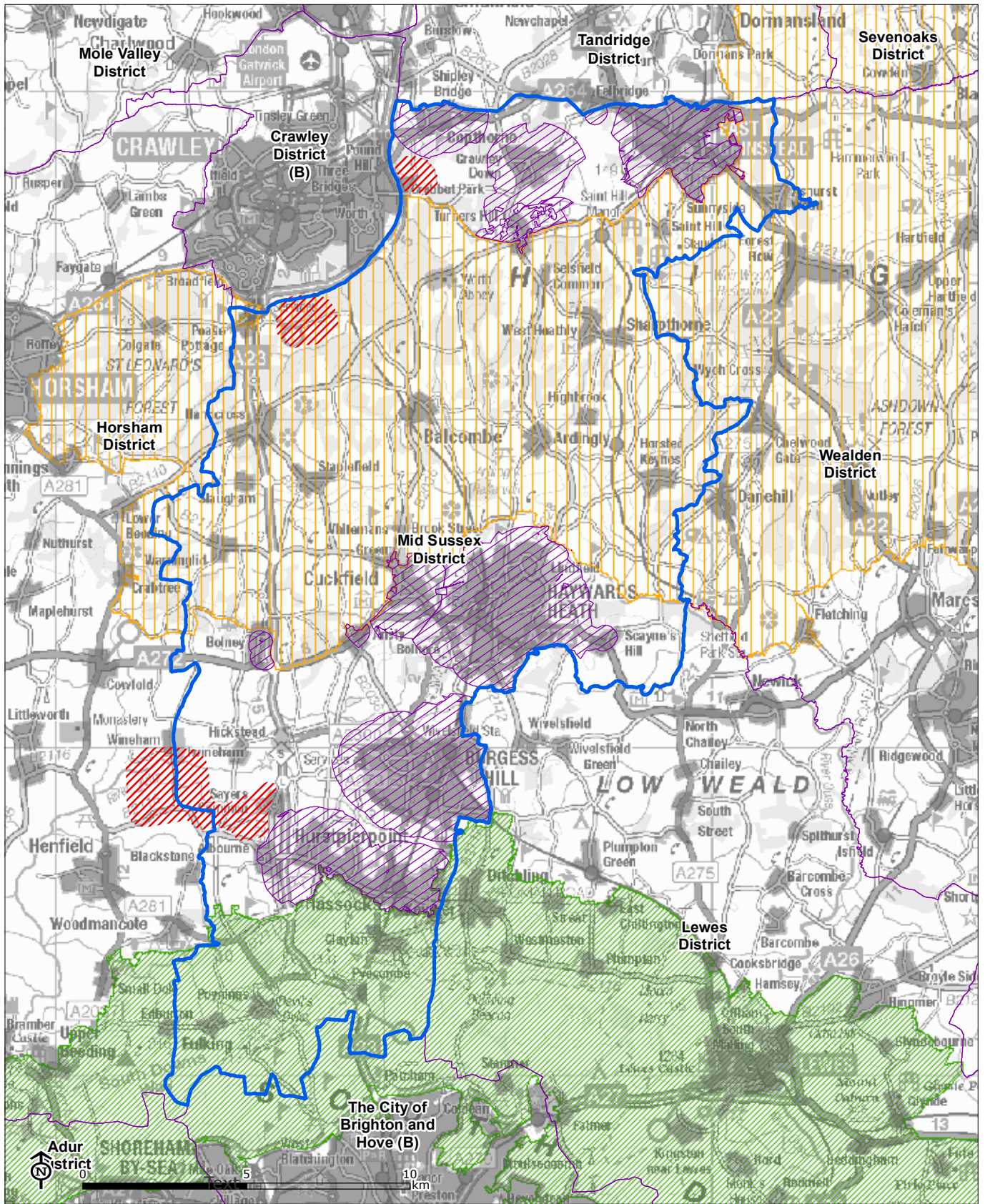
**Figure 4.3: Options 8 to 10 (provision of some or all of the unmet housing requirement for Brighton & Hove City)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000





**Mid Sussex SA**

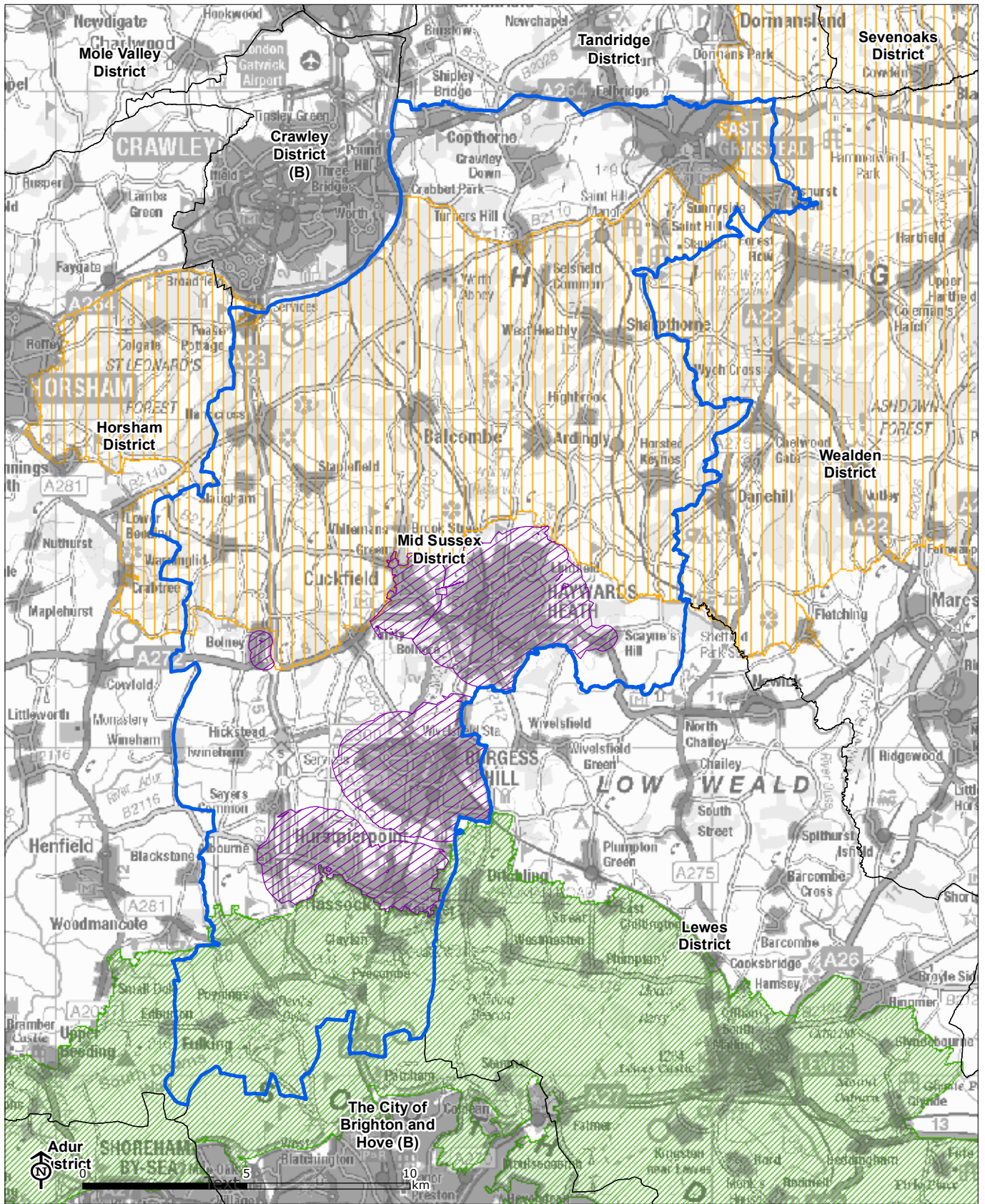
**Figure 4.4: Options 11 to 13 (provision of some or all of the unmet housing requirement for Crawley Borough)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

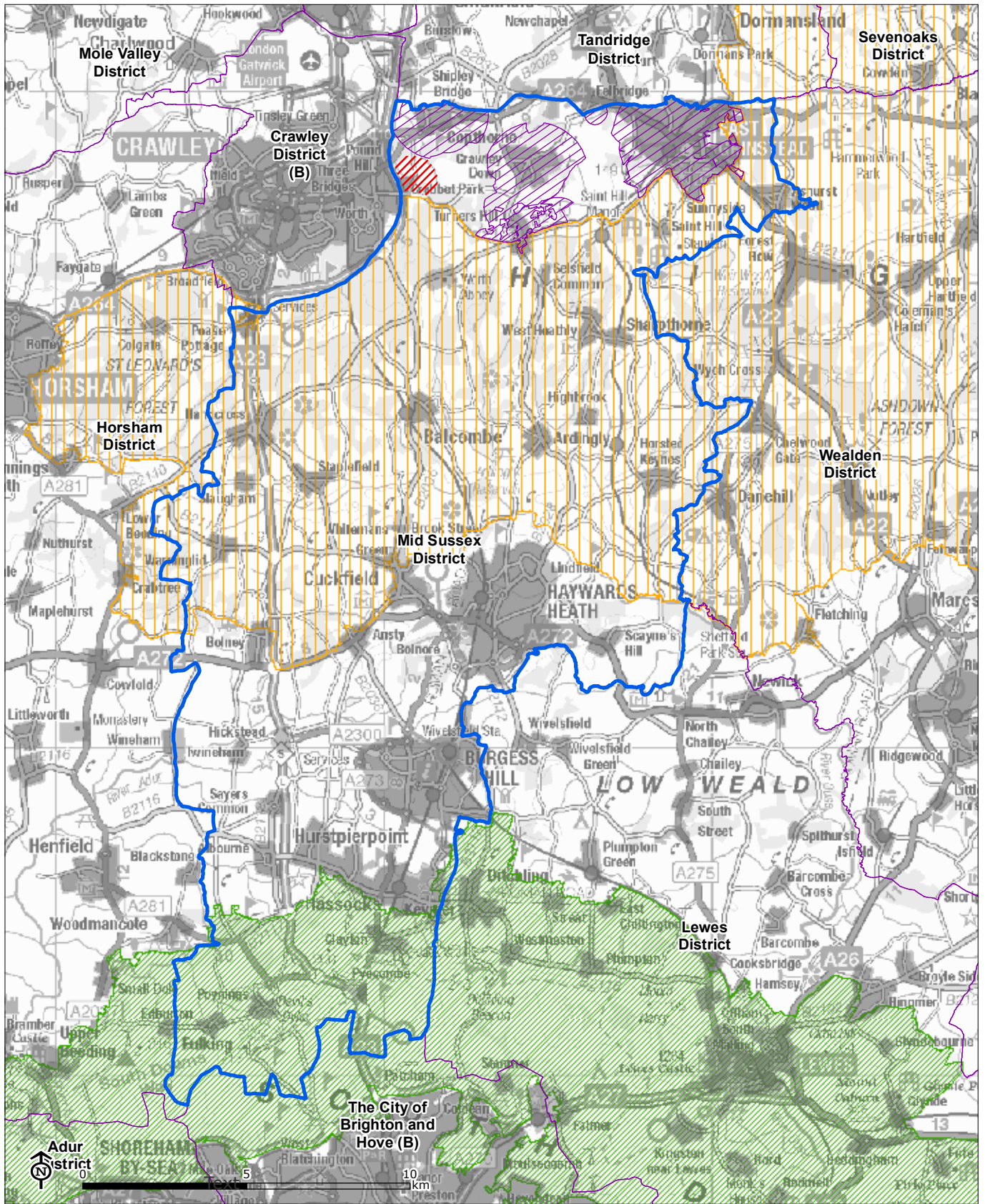
**Figure 4.5: Options 14 to 16 (provision of some or all of the unmet housing requirement for Lewes District)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000





**Mid Sussex SA**

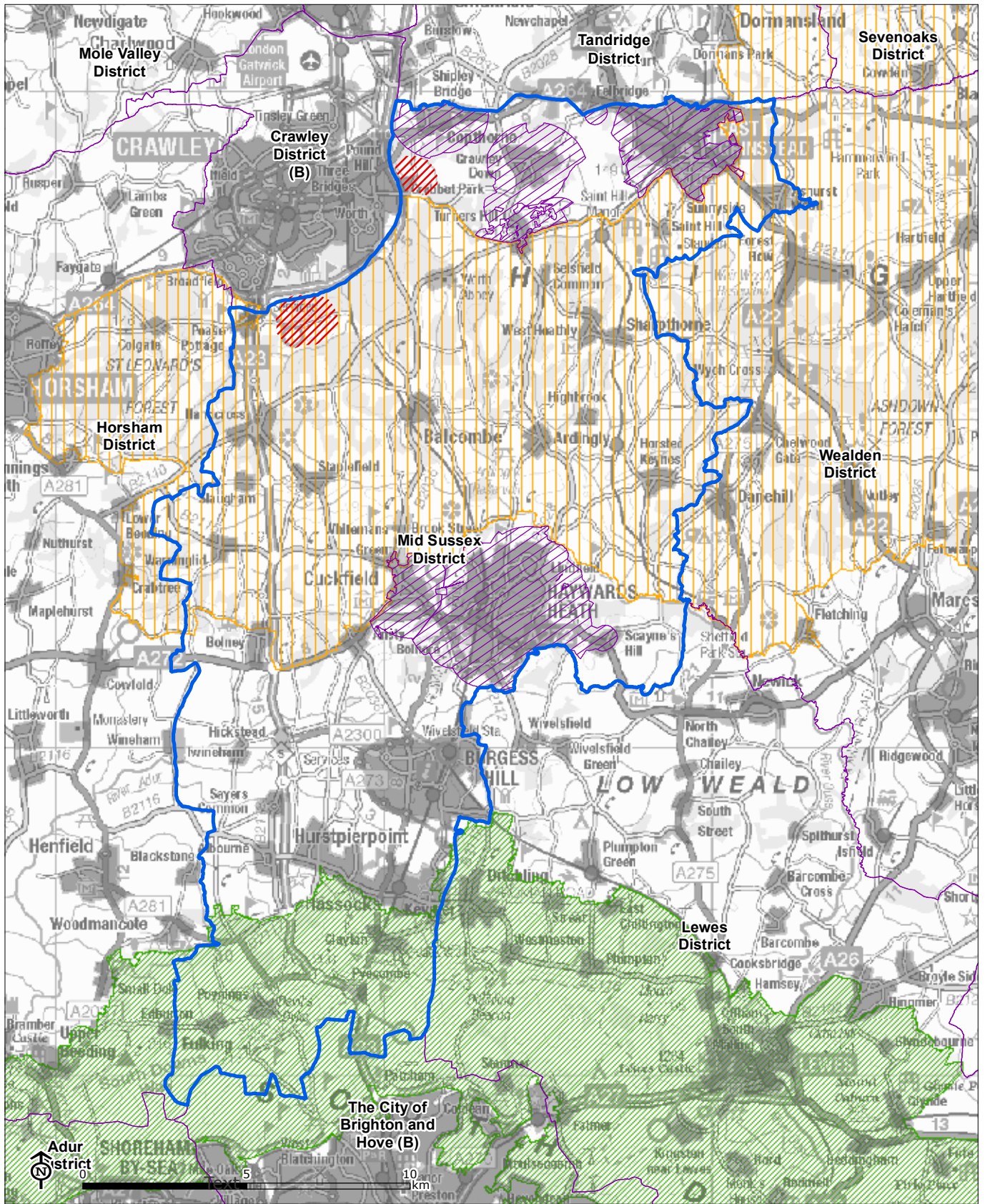
**Figure 4.6: Options 17 to 19 (provision of some or all of the unmet housing requirement for Tandridge District)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- Locations put forward to the District Council for development
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

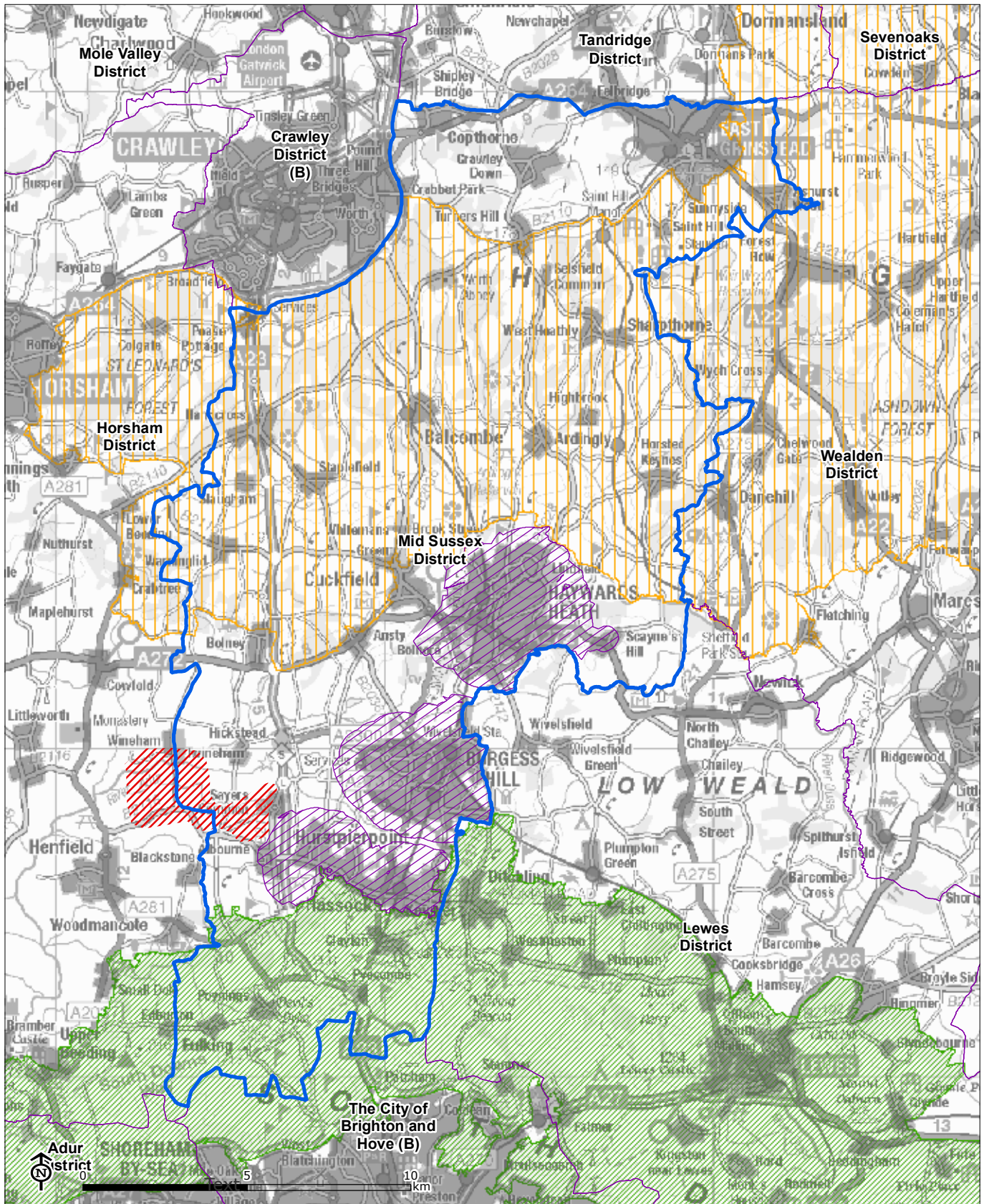
**Figure 4.7: Options 20 to 22 (provision of some or all of the unmet housing requirement for Wealden District)**

Source: MSDC, Natural England, OS.



**Map Scale @ A4: 1:165,000**





- Mid Sussex district
- Surrounding districts
- Locations put forward to the District Council for development with less than 4 Secondary Constraints and more than 3 services
- Locations put forward to the District Council for development
- High Weald Area of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Urban area

**Mid Sussex SA**

**Figure 4.8: Options 23 to 25 (provision of some or all of the unmet housing requirement for Worthing District)**

Source: MSDC, Natural England, OS.



Map Scale @ A4: 1:165,000

## 5 Sustainability Assessment Findings

- 5.1 The 25 options considered for meeting some or all of the neighbouring authorities' unmet need within Mid Sussex were assessed in groups of related options as follows:
- Options 1 to 4 (provision of some or all of the unmet housing requirement for all or a combination of neighbouring authorities).
  - Options 5-7 (provision of some or all of the unmet housing requirement for Adur District).
  - Options 8-10 (provision of some or all of the unmet housing requirement for Brighton & Hove City).
  - Options 11-13 (provision of some or all of the unmet housing requirement for Crawley District).
  - Options 14-16 (provision of some or all of the unmet housing requirement for Lewes District).
  - Options 17-19 (provision of some or all of the unmet housing requirement for Tandridge District).
  - Options 20-22 (provision of some or all of the unmet housing requirement for Wealden District).
  - Options 23-25 (provision of some or all of the unmet housing requirement for Worthing Borough).
- 5.2 The detailed sustainability assessment matrices are presented in **Appendix 2**, while a summary of the potential social, economic and environmental effects of each group of options is presented below.

### Determining significance and the issue of deliverability

- 5.3 The judgements regarding the significance of potential sustainability effects have generally been based on consideration of the overall number of additional homes that would need to be provided within Mid Sussex District, over and above the amount that was proposed within the 2013 Submission District Plan (i.e. 10,600 homes over the 20 year period 2011-2031). At the strategic scale, it is difficult to be precise about where the threshold lies between a minor effect and a significant effect. Given the amount of housing proposed within the 2013 Submission District Plan, it was determined that it is reasonable to assume that those options that would result in 5,000 or more additional homes being developed within the District (i.e. nearly 50% more dwellings than proposed in the Submission District Plan), would be more likely to give rise to significant positive and/or negative effects than options that would result in less than 5,000 additional homes.
- 5.4 However, for each set of three options relating just to meeting some or all the unmet needs of individual authorities, the option that would meet 100% of the neighbour's unmet need is judged as having a significant positive effect for the neighbouring authority in relation to SA objective 1 (provision of housing) irrespective of the 5,000 dwellings threshold.
- 5.5 In some options, considerably more than 5,000 additional homes would be provided for. In such instances, the significant positive/negative effects would still arise and there would be every likelihood that, the greater the numbers, the greater the magnitude of the significant effects arising. Thus, the effects of delivering 5,000 additional homes and the effects of delivering 10,000 additional homes would be both significant and are recorded as such, even though the latter is more likely to have even greater and more cumulative effects than the former.
- 5.6 Some of the options imply very high levels of additional homes being delivered. For example, Option 1 (to meet 100% of the unmet need of all neighbouring LPAs) would result in an additional 38,733 homes being built, and Option 2 (to meet 50% of the unmet need of neighbouring LPAs) would result in an additional 19,367 homes being constructed. The Sustainability Assessment

does not make any assumptions about whether or not these could be delivered in practice, but purely focuses on the likely effects if they were to be delivered.

- 5.7 In practice, it is highly unlikely that sufficient sites and capacity can be identified that are "suitable, available, and achievable" to accommodate such large numbers of homes, in light of the identified supply through the Strategic Housing Land Availability Assessment (SHLAA) work being undertaken by the Council. It will be for the Council to assess in more detail whether there are sufficient deliverable sites within the SHLAA to accommodate the potential options for growth assessed in this report. The conclusions within the Capacity Study will assist with this process.
- 5.8 For some of the options based on internal migration trends, the unmet housing need has been calculated as resulting in a negative figure in terms of the additional housing required in Mid Sussex. For example, Option 16 (meet Lewes's unmet need based on Internal Migration data) would result in -380 dwellings being delivered. Such options would result in a negative effect against SA objective 1 (Decent and affordable homes) because there would be no justification for providing for the unmet need in Mid Sussex as doing so would not provide homes that responded to internal migration trends. Such options would result in no additional homes in Mid Sussex and therefore would not result in any effects against the other SA objectives. They are included in the Sustainability Assessment for completeness.

### Options 1 to 4 (provision of some or all of the unmet need for all or a combination of neighbours)

- 5.9 Options 1-4 provide some or all of the unmet housing need for seven of the neighbouring authorities within the boundaries of Mid Sussex. As such higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, particularly for Options 1, 2 and 3 which base the amount of housing provided for on meeting the full unmet need of all seven LPAs (38,733 homes), meeting 50% unmet need of all seven LPAs (19,367 homes) and on meeting all unmet need based on travel to work patterns (13,572 homes). Option 4 provides for additional housing in the District based on internal migration patterns and the level of housing needed in this option is significantly lower (2,761 homes) than Options 1-3. **Table 5.1** summarises the sustainability effects identified for Options 1 to 4.



**Table 5.1: Sustainability effects identified for Options 1 to 4 (all of some of the neighbouring authorities' unmet need)**

Options:																		
1: Meet full unmet need of all LPAs (38,733)																		
2: Meet 50% unmet need of all LPAs (19,367)																		
3: Meet all unmet need based on travel to work data (13,572)																		
4: Meet all unmet need based on internal migration data (2,761)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• South of Crawley</li> <li>• Around East Grinstead</li> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Cuckfield</li> <li>• Around Bolney</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
1	++	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
2	++	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
3	+	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
4	+/-	+/- ?	+/- ?	+	+/-	-?	-	-?	+/- ?	+/- ?	+/-	-	-?	-	+	+	+	0

**Social effects**

5.10 The effects of Options 1-4 on the social objectives are likely to be mostly positive, as all of the options would be likely to have some degree of positive effect on increasing the amount of decent and affordable housing in the area. Options 1 and 2 provide for the highest number of houses in Mid Sussex District and also meet all or 50% of the unmet housing need of the seven neighbouring authorities; therefore a significant positive effect is expected on SA objective 1 relating to provision of homes. However, in practice these options would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet these option numbers in full. Considering that housing will be provided in relatively close proximity to existing settlements and town centres (Crawley, Crawley Down, Copthorne, East Grinstead, Hurstpierpoint, Burgess Hill and Haywards Heath) where services already exist these options are also expected to have a positive impact on providing ease of access to health services and open spaces (SA objective 2) as well as education (SA objective 3) and retail and community facilities (SA objective 4). Given the high levels of housing proposed in Options 1, 2 and 3 the positive effect was judged to be significant in comparison to where a reduced amount of housing is provided in Option 4. However, there is also potential for negative

effects on education provision, as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath, East Grinstead and Burgess Hill in particular) and therefore an overall mixed effect is expected on access to education for these options, with Options 1-3 potentially having a significant negative effect due to the higher number of new residents that would be looking for school places. All options were considered likely to have a mixed positive and negative effect on promoting cohesive and safe communities, as Options 1 to 4 would all result in provision of housing around the existing towns, villages and smaller villages in Mid Sussex. While this could benefit the larger towns and villages through provision of housing in areas of demand, but conversely could adversely affect the character of smaller villages. Again, Options 1 to 3 would be likely to have significant effects due to the high levels of housing proposed, whereas Option 4 was considered to have minor mixed effects.

### **Environmental effects**

- 5.11 The high levels of housing provided for in Options 1 to 4 are judged as having a negative impact on all of the environmental objectives, namely flood risk, efficient land use, conservation and enhancement of biodiversity, reducing road congestion, reducing waste generation, improving water quality and increasing energy efficiency. These options could result in increased numbers of housing within areas of high risk of flooding (Flood Zone 3); decrease the amount of Grade 2 Agricultural Land which is available for farming; impacting negatively upon biodiversity features through loss or damage to habitats and disturbance to species (including the internationally designated Ashdown Forest SPA and SAC); contribute negatively to road congestion (particularly as more outward commuting by new residents would likely be required); increase the need for new waste management facilities as more waste is produced by an increased population; contribute to demand for water supply and treatment in an area which is already under pressure; and raise energy demand in the District. A number of these effects could be avoided depending on the specific location of the additional dwellings required. However, these effects are more likely to be significant under Options 1 to 3 due to the higher number of additional housing that would be required within Mid Sussex, and therefore the more development locations that would be required. Mixed impacts are expected on SA objective 9 which seeks to protect the countryside, as despite potential for adverse effects on protected landscapes, development in close proximity to the High Weald AONB and South Downs National Park would provide new residents with easy access to high quality countryside and open spaces. Similarly, all four options could have mixed effects on SA objective 10 which seeks to enhance the historic environment as new development has the potential to negatively impact upon or conversely enhance the setting of historic assets depending on the development's exact location and design. Finally, mixed effects SA objective 11 (reducing road congestion) are also identified for the four options, as while new residents could make use of public transport links where they exist currently, it is likely that there would be increased pressure on public transport systems from the increased population, and that there could be increased levels of out commuting by road, particularly in the shorter term, before new employment opportunities are delivered within the District to support additional housing.

### **Economic effects**

- 5.12 All four options would be likely to have a positive effect on the objectives which encourage town centre regeneration (SA objective 15) and high and stable employment levels (SA objective 16) as the new housing would mainly be provided around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. Options 1, 2 and 3 propose higher levels of housing and therefore considering these higher levels it is considered that the positive effect they might have on these SA objectives is significant. Options 1 to 3 are considered as having mixed positive and negative effects on encouraging economic growth (SA objective 17). While the construction and development of housing in the District is an economic activity in its own right, potentially providing job opportunities and increasing demand for services in the area, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for new residents. Option 4 provides lower levels of housing and is not expected to place as much pressure on the requirement for additional employment land meaning a minor positive effect only is expected. As all options are to do with the provision of housing and do not provide for additional tourist

facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## Options 5 to 7 (provision of some or all of the unmet housing requirement for Adur District)

- 5.13 Options 5 to 7 provide some or all of the unmet housing need for Adur District within the boundaries of Mid Sussex. As such higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, but all three options would result in well below 5,000 additional homes. **Table 5.2** summarises the sustainability effects identified for Options 5 to 7.

**Table 5.2: Sustainability effects identified for Options 5 to 7 (Adur's unmet need)**

Options: Adur																		
5. Meet all Adur's unmet need (1,160 houses)																		
6. Meet Adur's unmet need based on travel to work data (779 houses)																		
7. Meet Adur's unmet need based on Internal Migration data (30 houses)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental										Economic		
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
5	++	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
6	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
7	0	+	+?	+	0	0	0	0	+?	0	0	0	0	0	+	+	+	0

### Social effects

- 5.14 Option 5, Option 6 and Option 7 would provide housing required for Adur District within Mid Sussex. Option 5 requires meeting the full unmet need of Adur (1,160 homes); Option 6 requires meeting 50% of Adur's unmet housing need (779 homes); and Option 7 requires meeting Adur's unmet housing need based on recent travel to work patterns (30 homes). Therefore, Options 5 and 6 are anticipated as having a significant and minor positive effect respectively on increasing the amount of decent and affordable housing for Adur District. As Option 7 provides for only 30 additional houses and would mean that a significant number of houses would still be needed to meet Adur's unmet housing need, a negligible effect is expected. Positive effects are predicted for the SA objectives which seek to improve access to education and health services. This is because additional housing will mainly be provided in close proximity to existing urban centres (Burgess Hill, Haywards Heath and Hurstpierpoint) which should provide good access to existing services for the new residents. A negative effect on access to education services is also noted however, due to existing pressures on school places in the District (in particular at Hurstpierpoint, Haywards

Heath and Burgess Hill) giving overall mixed effects on this SA objective. Given that they would provide for housing at locations which are larger towns, smaller villages and new development locations, Option 5 and Option 6 are expected to have both minor positive and minor negative effects on SA objective 5 (encouraging community cohesion). Given the lower number of houses provided for by Option 7 (30 houses over 20 years) any potential negative effect on village character is likely to be avoided, and there is likely to be a negligible effect on community cohesion.

### Environmental effects

- 5.15 Option 5 and Option 6 are anticipated as having a minor negative effect on objectives which relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste, improving water quality and increasing energy efficiency. This is because the higher levels of housing provided for could be located in areas where flood risk is high (Flood Zone 3) and where they may adversely impact upon habitats and species through disturbance or damage, plus the additional homes and population could result in an overall increase in waste production, pressure on water resources and energy consumption. A number of these effects could be avoided depending on the specific location of the additional dwellings required. Mixed impacts were identified on objectives relating to protecting the countryside, the historic environment and reducing congestion. This is because the potential development locations are in close proximity to the High Weald AONB as well the South Downs National Park which may potentially adversely affect the setting of these nationally protected landscapes; conversely, this proximity would mean new residents would have easy access to high quality green space. A mixed effect is recorded for the objective relating to the historic environment as it is acknowledged that development may enhance or detract from the setting of historic assets depending on the development's exact location and design. As increased out commuting may result from accepting some or all of Adur's unmet housing need, but there is potential for new residents to make use of public transport links in Haywards Heath, Burgess Hill and Hurstpierpoint a mixed effect is expected on SA objective 11 (reducing road congestion). Option 7 is considered unlikely to have an effect on any of the environmental objectives due to the low number of additional housing that would need to be developed in the District.

### Economic effects

- 5.16 Option 5, Option 6 and Option 7 may have minor positive effects on the objectives which relate to encouraging town centre regeneration, economic growth and high and stable employment levels (around the existing settlements of Haywards Heath, Burgess Hill and Hurstpierpoint). The provision of additional housing mainly around existing settlements should provide new residents with easy access to town centres as well as existing employment sites. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is thought that they will have a negligible effect on the objective relating to encouraging tourism.

## Options 8 to 10 (provision of some or all of the unmet housing requirement for Brighton & Hove City)

- 5.17 Options 8 to 10 provide some or all of the unmet housing need for Brighton & Hove City within the boundaries of Mid Sussex. As such, significantly higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, as Option 8 would result in more than 5,000 additional homes (10,800). While fewer houses would be needed under Options 9 and 10, they would still result in 4,008 or 2,220 additional homes respectively over the plan period, which is higher than all three of the Adur options, two of the Lewes and Wealden options and the lowest Crawley, Tandridge and Worthing options. There is a gap between options 9 and 10, and the higher provision associated with option 8. Despite the difference in numbers of homes that would be provided between Options 9 and 10, neither option is likely to result in significant effects on the SA objectives, therefore Options 9 and 10 perform the same. Whilst there is merit in appraising a value somewhere between the two (for example, in the region of 7000-8,000), this too would result in more than 5,000 additional homes and would have significant negative effects on environmental objectives. It would therefore be very similar to



option 8 in its conclusion. **Table 5.3** summarises the sustainability effects identified for Options 8 to 10.

**Table 5.3: Sustainability effects identified for Options 8 to 10 (Brighton and Hove's unmet need)**

Options: Brighton & Hove																			
8. Meet all of Brighton & Hove's unmet need (10,800)																			
9: Meet Brighton & Hove's unmet need based on Travel to Work data (4,008)																			
10: Meet Brighton & Hove's unmet need based on Internal Migration data (2,200)																			
Broad potential locations for development:																			
<ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																			
Policy Option	Social					Environmental										Economic			
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism	
8	++	+/- ?	+/- ?	+	++/-	--?	--?	--?	+/- ?	+/- ?	+/-	--?	--	--	++	++	+/-	0	
9	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0	
10	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0	

### Social effects

5.18 Options 8, 9 and 10 would provide additional housing for Brighton & Hove in Mid Sussex. All options are likely to have a positive effect on increasing the amount of decent and affordable housing in the area, and as Option 8 meets all of the unmet housing need for Brighton & Hove a significant positive effect is expected on SA objective 1. However, in practice Option 8 would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full. Considering that housing would be provided in relatively close proximity to existing settlements and town centres (Hurstpierpoint, Burgess Hill and Haywards Heath) where services already exist, Options 8 to 10 are expected to have a positive effect on providing ease of access to health services and open spaces as well as to education and retail and community facilities. Negative effects on education provision are also identified however, as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath and Burgess Hill in particular) and therefore an overall mixed effect is expected on this SA objective, with a significant negative effect for Option 8. Given that Option 8 would provide for a large amount of housing at locations which are larger towns, smaller villages and new development locations, it is expected to have both significant positive and negative effects on SA objective 5 (encouraging community cohesion). Due to the lower number of houses provided for by Options 9 and 10 the mixed effect is more likely to be minor on community cohesion.

### Environmental effects

5.19 The high levels of housing provided for in Option 8, 9 and 10 are considered likely to have a negative impact on many of the environmental objectives, namely flood risk, efficient land use,

conservation and enhancement of biodiversity, reducing waste generation, improving water quality and increasing energy efficiency. These options could result in increased number of houses within areas of high flood risk (Flood Zone 3); potentially result in development occurring on Grade 2 Agricultural Land; adversely impacting upon biodiversity in the area through damage or disturbance to habitats and species; increase the need for waste management facilities as more waste is produced by an increased population; contribute significantly to demand for water supply and water quality in an area which is already under pressure; and raise energy demand in the District. The negative effects are expected to be significant under Option 8 as it would deliver more than 5,000 additional homes within the District. Mixed impacts are expected on the objectives which seek to protect the countryside, reduce road congestion as well as the objective which seeks to enhance the historic environment. The provision of housing in close proximity to the nationally protected landscapes of High Weald AONB and South Downs National Park will potentially negatively impact upon their setting but will also provide new residents with easy access to high quality greenspace. It is recognised that good public transport connections already exist within the District and between Brighton & Hove and Mid Sussex, and that the potential development locations for the most part (with the exception of the potential new market town at Sayers Common) will provide relatively easy access to these connections. Nonetheless, given the scale of housing to be provided in Mid Sussex to meet Brighton & Hove's unmet need, particularly under Option 8, the potential for increased out commuting particularly to Brighton & Hove is considered likely to have a significant negative effect on reducing road congestion, giving an overall mixed effect on SA objective 11. Given that most of the locations are in and around existing settlements where heritage assets have been identified a mixed effect is expected on protecting the historic environment as it is recognised that development may enhance or detract from the setting of historic assets depending on the development's exact location and design.

### Economic effects

- 5.20 All options will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites (Options 8 and 9 are considered to have significant positive effects). All three options are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area. However, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for the larger number of new residents under Option 8, therefore, it is considered likely to have a negative effect as well. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## Options 11 to 13 (provision of some or all of the unmet housing requirement for Crawley Borough)

- 5.21 Options 11 to 13 provide some or all of the unmet housing need for Crawley within the boundaries of Mid Sussex. As such, higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, but all three options would result in less than 5,000 additional homes. **Table 5.4** summarises the sustainability effects identified for Options 11 to 13.

**Table 5.4: Sustainability effects identified for Options 11 to 13 (Crawley's unmet need)**

Options: Crawley
11: Meet all Crawley's unmet need (4,173 homes)
12: Meet Crawley's unmet need based on travel to work data (2,651 homes)

13: Meet Crawley's unmet need based on Internal Migration data (1,240 homes)

Broad potential locations for development:

- Around Copthorne
- Around Crawley Down
- East of Crawley
- South of Crawley
- Around East Grinstead
- Around Haywards Heath/Lindfield
- Around Burgess Hill
- Around Cuckfield
- Around Bolney
- Around Hurstpierpoint/Hassocks
- New settlement/ Sayers Common

Policy Option	Social				Environmental								Economic					
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
11	++	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
12	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
13	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0

**Social effects**

5.22 All options are anticipated as having some degree of positive effect on increasing the amount of decent and affordable housing in the area. Option 11 provides for the highest number of houses in the Mid Sussex District and also meets all of the unmet housing need; therefore a significant positive effect is expected on the SA objective. However, in practice Option 8 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full. As the potential development locations that would need to be used to meet Crawley's unmet need are for the most part located around existing settlements (Crawley, Crawley Down, Copthorne, East Grinstead, Hurstpierpoint, Burgess Hill and Haywards Heath) a positive effect is expected on the objectives which relate to providing access to health services and open space as well as retail and community facilities. The established facilities at these locations should be easily accessible to new residents. Mixed effects are expected on the objective which relates to access to education as although development at or around these existing settlements should mean new residents are within close proximity of existing education facilities some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath, East Grinstead and Burgess Hill in particular). As the level of housing provided in all options is less than 5,000 the anticipated positive effects are minor for all social related SA objectives (except SA objective 1). All options provide for housing at a mix of locations ranging from larger towns (Burgess Hill, Haywards Heath and East Grinstead), and villages (Hurstpierpoint, Cuckfield and Crawley Down) and new development locations. As such a minor positive and minor negative effect is expected on community cohesion for all three options, as the character of some villages may be adversely affected, but the provision of new homes in larger villages in towns may help contribute to community cohesion.

### Environmental effects

5.23 The varying levels of housing provided are considered to have a negative effect on all of the environmental SA objectives. Flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste, maintain and improving water quality and increasing energy efficiency could all be negatively impacted upon by the levels of houses proposed at the potential development locations identified. Mixed effects are expected for all options on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. This is because potential development locations that might be used for these Crawley options are in close proximity to and even within (the site south of Crawley) the nationally protected landscapes of High Weald AONB and South Downs National Park. A significant negative effect on landscape could occur if the development location south of Crawley were used, however, it is likely that this location could be avoided (by steering development to the other broad potential development locations), therefore only minor negative effects are identified. In addition, there could also be a minor positive effect of providing housing near the AONB or National Park, as this would give new residents relatively easy access to high quality greenspace in close proximity. The mixed effect on the historic environment is due to the potential for new development to enhance or detract from the setting of historic assets dependent on design and specific location. It is likely that the siting of development in and around existing settlements which have good transport links with Crawley may cause an increase in commuting of new residents back to Crawley for employment, this could be positive in terms of public transport due to existing rail links, but negative if increased commuting by car occurs.

### Economic effects

5.24 All options will have a minor positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. All three options are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## Options 14 to 16 (provision of some or all of the unmet housing requirement for Lewes District)

5.25 Options 14 to 16 provide some or all of the unmet housing need for Lewes within the boundaries of Mid Sussex. As such, higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, but all three options would result in less than 5,000 additional homes. **Table 5.5** summarises the sustainability effects identified for Options 14 to 16.

**Table 5.5: Sustainability effects identified for Options 14 to 16 (Lewes’s unmet need)**

Options: Lewes
14: Meet all Lewes’s unmet need (4,200 homes)
15: Meet Lewes’ unmet need based on travel to work data (2,131 homes)
16: Meet Lewes’s unmet need based on Internal Migration data (-380 homes: no contribution to unmet need)
Broad potential locations for development: <ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> </ul>

<ul style="list-style-type: none"> <li>• Around Cuckfield</li> <li>• Around Bolney</li> <li>• Around Hurstpierpoint/Hassocks</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
14	++	+	+/-?	+	+/-	-?	-?	-?	+/-	+/-?	+/-	-?	-	-?	+	+	+	0
15	+	+	+/-?	+	+/-	-?	-?	-?	+/-	+/-?	+/-	-?	-	-?	+	+	+	0
16	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Social effects

5.26 Options which provide for additional housing in the District are anticipated as having a positive effect on the amount of decent and affordable housing in the area. As Option 14 would meet all of Lewes’s unmet housing needs a significant positive effect is expected on this SA objective. Option 16 will not result in any additional housing in the District and therefore a minor negative effect is expected on the SA objective. Positive effects are expected on SA objectives related to providing access to health services and open spaces as well as retail and community facilities in the options which provide for additional housing as these homes will, for the most part, potentially be in locations in and around existing settlements (Hurstpierpoint, Haywards Heath and Burgess Hill) where these types of services are already provided. Mixed effects are expected on the objective which relates to access to education as although development at or around these existing settlements should mean new residents are within close proximity of existing education facilities some existing pressures on school places have been identified in the District. Given that they would provide for housing at locations which are larger towns (Haywards Heath and Burgess Hill), smaller villages (Hurstpierpoint, Cuckfield and Bolney) and new development locations, Option 14 and Option 15 are expected to have both minor positive and minor negative effects on SA objective 5 (encouraging community cohesion). Given that no houses would be provided for by Option 16 there is likely to be a negligible effect on community cohesion..

### Environmental effects

5.27 Options 15 and 16 will result in negative effects on all of the environmental SA objectives which relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. As the houses proposed may be sites in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south there is potential for this development to adversely affect these landscapes’ settings, while at the same time new residents at these locations would have immediate and easy access to high quality greenspace. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design. While there are good public transport links between Haywards Heath, Burgess Hill and Hurstpierpoint, which have been identified as potential development locations for Options 15 to 17, there is potential for increased road commuting of new residents to Lewes for employment as the public transport links between Lewes and Mid Sussex are relatively weak.

**Economic effects**

5.28 All options which propose any new housing will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. Options 14 and 15 are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area (Option 16 does not make provision for any new homes to meet Lewes’s unmet need, therefore a negligible effect is expected). As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

**Options 17 to 19 (provision of some or all of the unmet housing requirement for Tandridge District)**

5.29 Options 17 to 19 provide some or all of the unmet housing need for Tandridge within the boundaries of Mid Sussex. As such, higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, with Option 17 resulting in more than 5,000 additional homes (6,580). **Table 5.6** summarises the sustainability effects identified for Options 14 to 16.

**Table 5.6: Sustainability effects identified for Options 17 to 19 (Tandridge’s unmet need)**

Options: Tandridge																		
17: Meet all Tandridge’s unmet need (6,580 homes)																		
18: Meet 50% of Tandridge’s unmet need (3,290 homes)																		
19: Meet Tandridge’s unmet need based on Internal Migration data (650 homes)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• Around East Grinstead</li> </ul>																		
Policy Option	Social				Environmental								Economic					
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
17	++	+	+/-?	+	++/--	--?	-?	--?	+/-?	+/-?	+/-	--?	-	-	++	++	+/-	0
18	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
19	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0

**Social effects**

5.30 As all options provide for additional homes in the District, positive effects are expected on the objective related to the provision of decent and affordable housing. However, Option 17 provides for higher levels of homes in the District and also meets all of Tandridge’s unmet need meaning



that a significant positive effect is expected on this SA objective, although in practice Option 17 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full. As housing is provided for at the potential development locations in and around existing settlements (Crawley, Copthorne, Crawley Down and East Grinstead) where relevant services are already provided, a minor positive effect is expected on the objectives of providing good access to health services and retail and community facilities. A similar effect would be expected on access to education given the potential development locations identified, however, pressure exists on places for schools at some of the broad development locations that might be used to meet Tandridge's need (namely East Grinstead). Therefore, overall a mixed effect is expected on this SA objective for Options 17 to 19, with a potentially significant negative effect under Option 17 due to the higher number of homes proposed. Given that they would provide for housing at locations which are larger towns (Crawley and East Grinstead) as well as villages (Copthorne and Crawley Down), all three options are expected to have both positive and negative effects on SA objective 5 (encouraging community cohesion). However, effects are likely to be significant under Option 17 due to the higher number of homes proposed (6,580).

### Environmental effects

- 5.31 The location of housing in the north of the District if these options were implemented is expected to have a negative effect on the environmental objectives of flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. The potential development locations are all to the north of the High Weald AONB, and contain areas which are at high risk of flooding (Flood Zone 3), Grade 3 Agricultural Land, nature conservation sites and are within the Ashdown Forest SAC and SPA 7km buffer zone. Given the proximity of these potential development locations to areas of ecological interest there is potential for adverse effects on biodiversity in general, and specifically on the Ashdown Forest SAC and SPA through disturbance and damage to habitats as well as air pollution caused by increased car journeys in the area. All three options could lead to increased levels of waste by an increased population in the District and will lead to an increased energy demand for the same reason. The effects are considered to be more significant under Option 17 than 18 and 19 due to the higher number of homes to be delivered. The higher levels of housing under Option 17 also have potential to significantly impact upon water provision and quality in the area. Mixed impacts are expected on the objectives which seek to protect the countryside and the historic environment, as well as the objective which seeks to reduce road congestion. As development locations are within close proximity to the nationally protected landscape of the High Weald AONB both positive and negative effects are expected. New residents will have easy access to this high quality greenspace however the provision of housing at this location has the potential to adversely impact upon the setting of the landscape. A mixed effect is recorded for the objective relating to the historic environment as development may enhance or detract from the setting or historic assets depending on the development's exact location and design. As potential development locations are located in and around existing settlements new residents will have good access to existing public transport links between for example Crawley and London. However, the need for new housing to meet Tandridge's needs is primarily in the north of Tandridge with close access to London. Therefore, providing housing in Mid Sussex to meet Tandridge's needs might encourage longer commuting patterns (e.g. to London by train) or commuting by road to employment sites in Tandridge to continue employment at these locations, hence the potential significant negative effect for SA objective 11 (reducing road congestion).

### Economic effects

- 5.32 All options would have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites, and this is likely to be significant for Option 17. Options 17 to 19 are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area. However, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for



the larger number of new residents under Option 17, therefore, it is considered likely to have a negative effect as well. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## Options 20 to 22 (provision of some or all of the unmet housing requirement for Wealden District)

- 5.33 Options 20 to 22 provide all, some or none of the unmet housing need for Wealden within the boundaries of Mid Sussex. As such, higher levels of housing would be provided in the District under Options 20 and 21 than currently proposed in the Mid Sussex District Plan, but all three options would result in less than 5,000 additional homes, with Option 22 resulting in no additional homes. **Table 5.7** summarises the sustainability effects identified for Options 20 to 22.

**Table 5.7: Sustainability effects identified for Options 20 to 22 (Wealden’s unmet need)**

Options: Wealden																		
20. Meet all Wealden's unmet need (3,320 houses)																		
21. Meet Wealden's unmet need based on travel to work data (2,375 houses)																		
22. Meet Wealden's unmet need based on Internal Migration data (-931 houses: no contribution to unmet need)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• South of Crawley</li> <li>• Around East Grinstead</li> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Cuckfield</li> </ul>																		
Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
20	++	+	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-?	+	+	+	0
21	+	+	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-?	+	+	+	0
22	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Social effects

- 5.34 Options 20, 21 and 22 provide housing for Wealden within Mid Sussex based on different scenarios. Option 22 provides for Wealden’s unmet housing needs based on Internal Migration data (which is an outward migration figure of 931 homes, meaning no homes would be provided in Mid Sussex District). Options which provide for additional housing in the District are anticipated as having a positive effect on the amount of decent and affordable housing in the area. As Option 20 provides for higher levels of housing as well as meeting all of Wealden’s

unmet housing needs a significant positive effect is expected on this SA objective. Option 22 will not result in any additional housing in the District and therefore a minor negative effect is expected on the SA objective. Positive effects are expected on SA objectives related to providing access to health services and open spaces as well as retail and community facilities in the options which provide for additional housing as these homes will, for the most part, potentially be in locations in and around existing settlements (Crawley, Haywards Heath, East Grinstead, Copthorne and Crawley Down) where these types of services are already being provided. Given that they would provide for housing at locations which are larger towns (Crawley, Haywards Heath, East Grinstead), smaller villages (Copthorne and Crawley Down) and new potential development locations (east and south of Crawley), Options 20 and 21 are expected to have both minor positive and minor negative effects on SA objective 5 (encouraging community cohesion). Given that no houses would be provided for by Option 22, this option is likely to have a negligible effect on community cohesion.

### Environmental effects

- 5.35 Options 20 and 21 will result in negative effects on SA objectives which relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Given that most of Wealden's unmet need would be provided in the north of the District it is expected that a negative effect would result on the Ashdown Forest SAC and SPA which are sensitive to nitrogen deposition due to increased car journeys in the area. Biodiversity would also be adversely affected if housing was to be sited around this area through disturbance from recreational pressure or damage to habitats. Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. As the houses proposed may be on sites in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south there is potential for this development to adversely affect the setting of these landscapes, while at the same time new residents at these locations would have easy access to the high quality greenspace. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design. Good internal public transport links to existing settlements within the District at potential development locations may positively affect road congestion, however public transport links from the District to Wealden are relatively weak meaning that there is potential for increased road journeys by new residents to employment locations in Wealden.

### Economic effects

- 5.36 All options which propose any new housing will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. Options 20 and 21 are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increase demand for services in the area. Option 22 would have negligible effects on these economic objectives as no housing would be provided under this option. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## Options 23 to 25 (provision of some or all of the unmet housing requirement for Worthing District)

- 5.37 Options 23 to 25 provide some or all of the unmet housing need for Worthing within the boundaries of Mid Sussex. As such, higher levels of housing would therefore be provided in the District than currently proposed in the Mid Sussex District Plan, with Option 23 resulting in more than 5,000 additional homes (7,500). **Table 5.8** summarises the sustainability effects identified for Options 23 to 25.

**Table 5.8 Sustainability effects identified for Options 23 to 25 (Worthing's unmet need)**

Options:																		
23: Meet all Worthing's unmet need (7,500 houses)																		
24: Meet 50% of Worthing's unmet need (3,750 houses)																		
25: Meet Worthing's unmet need based on Internal Migration data (-70 houses: no contribution to unmet need)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
23	++	+?	+/- ?	+	++/--	--?	--?	--?	+/- ?	+/-	--	--?	--	--	++	++	+/-	0
24	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/-	-	-?	-	-	+	+	+	0
25	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Social effects**

5.38 Options 23, 24 and 25 provide housing for Worthing within Mid Sussex based on different scenarios. Option 25 provides for additional housing in the District based on internal migration data (which is a commuting outflow figure of 70 homes, meaning no housing would be provided within Mid Sussex in this option). All options which provide extra housing in the District (Option 23 and Option 24) are anticipated as having some degree of positive effect on increasing the amount of decent and affordable housing in the area. Option 23 provides for the highest number of houses in the Mid Sussex District and also meets all of the unmet housing need; therefore a significant positive effect is expected on the SA objective, while Option 25 would have a minor negative effect as it does not contribute to Worthing's unmet need, although in practice Option 23 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full. Considering that housing will mainly be provided in relatively close proximity to existing settlements and town centres (Hurstpierpoint, Burgess Hill and Haywards Heath) where services already exist these options are expected to have a positive impact on providing ease of access to health services and open spaces as well as to retail and community facilities. A negative effect on education provision is identified as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath and Burgess Hill in particular) and this could be significant under Option 23 due to the high number of homes to be provided. There may be some minor positive effects in the short term as additional housing will be in close proximity to existing education facilities, therefore an overall mixed effect is expected on access to education for Option 23 and Option 24, with a negligible effect for Option 25. Given that they would provide for housing at locations which are larger towns (Haywards Heath and Burgess Hill) as well as villages (Hurstpierpoint) and new development locations, Options 23 and 24 are expected to have positive effects on SA objective 5 (encouraging community cohesion), while Option 23 might also have

negative effects on settlement character due to the higher number of homes to be delivered. Effects would be negligible under Option 25 due to no homes being provided under this option.

### **Environmental effects**

- 5.39 Option 23 and Option 24 will result in negative effects on SA objectives which relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Significant negative effects are expected from Option 23 due to the higher number of homes to be provided making it more difficult to avoid sensitive environmental areas and placing more pressure on existing infrastructure. Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. As housing proposed may be located in areas in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south, there is potential for this development to adversely affect these landscapes' setting, while at the same time new residents at these locations would have immediate and easy access to high quality greenspace. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design. Although there are good internal public transport links which might positively affect road congestion at the existing settlements in the District identified as potential development locations, the potential for increased commuting of new residents to Worthing by road (due to limited public transport connections between these authorities and because Worthing does not abut Mid Sussex) means an overall negative effect on this SA objective has been identified. .

### **Economic effects**

- 5.40 All options will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites, and this could be significant under Option 23. Options 23 and 24 are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area. Option 23 may also have minor negative effects as additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for the larger number of new residents under Option 23. Option 25 would have negligible effects on these economic objectives as no housing would be provided under this option. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

## 6 Conclusions

- 6.1 The overall aim of this study is to provide a sound Sustainability Assessment of the impacts of potential requests from neighbouring authorities to accommodate their unmet housing needs within Mid Sussex.
- 6.2 The Sustainability Assessment has built upon the capacity work undertaken at an earlier stage by LUC, and has sought to establish the baseline context and key sustainability issues from available documentation for the neighbouring local authority areas, and to develop and assess reasonable options for accommodating the unmet housing needs of neighbouring local authorities within Mid Sussex, using the existing SA framework used for the Mid Sussex District Plan.
- 6.3 25 options have been assessed using a range of scenarios from accommodating all the estimated unmet housing needs of neighbouring local authorities, to 50% of their unmet housing needs, to options based on commuting patterns and on past migration rates. To inform the assessment, five potential development locations north of the High Weald AONB and six potential development locations south of the High Weald AONB and north of the South Downs National Park were identified.
- 6.4 If the neighbouring local authorities are unable to provide for all their unmet housing need within their own administrative boundaries, there is likely to be a considerable shortfall in housing provision across the local authorities as a whole. For some, such as Brighton & Hove City, this is likely to be a substantial shortfall. The desk-based review of sustainability issues shows that the neighbouring authorities have a range of constraints, some authorities more than others. This is likely to make delivery of their full unmet housing need within their own boundaries a challenge.
- 6.5 If all the potential unmet need of all the neighbouring local authorities were to be met in Mid Sussex, this would equate to c 38,733 net additional dwellings over the 20 year period, 2011 to 2031. To put this into context, the now withdrawn submission version of the Mid Sussex District Plan provided for 10,600 dwellings over the same period. If the full unmet housing need were to be added to the need identified for Mid Sussex, this would increase housing provision to nearly 50,000 dwellings, or 4.7 times the amount of housing included in the withdrawn Mid Sussex District Plan. Even 50% of the unmet housing need would result in nearly 30,000 dwellings in total being provided in Mid Sussex, or nearly three times the amount of housing provided for in the withdrawn Mid Sussex District Plan. The options based on commuting patterns would also give rise to a significant increase in additional housing development in Mid Sussex (c 13,572 dwellings). Although the options based on past trends in migration would result in a smaller increase of around 4,140 additional dwellings, this would still amount to nearly 40% more housing than was provided in the withdrawn Mid Sussex District Plan, and would be likely to require significant urban extensions to deliver.
- 6.6 As discussed in Chapter 5, this study has assumed that those options that would result in 5,000 or more additional homes being developed within the District (i.e. nearly 50% more dwellings than proposed in the Submission District Plan), would be more likely to give rise to significant positive and/or negative effects than options that would result in less than 5,000 additional homes.
- 6.7 In common with neighbouring authorities, the Capacity Study for Mid Sussex identified that there are significant constraints to development within the District. In order to comply with national planning policy, it would be inappropriate to provide for more than small scale development within those parts of the District that are designated as AONB or National Park. This reduces the options for delivering development, and even outside the AONB and National Park care is needed to ensure that the setting of these nationally important landscapes is not significantly harmed.
- 6.8 Unsurprisingly, the options that propose the most additional housing would result in the most significant effects. Where housing need is met in full, there would be significant positive effects against some of the social SA objectives, especially SA objective 1 (To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford) although in

practice, the options meeting some or all of the seven neighbouring authorities' unmet need (Options 1, 2 and 3) would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land in Mid Sussex (as determined through the Council's SHLAA work) to meet these option numbers in full. In addition, there would be likely to be issues regarding the capacity of health services (SA objective 2) and education facilities (SA objective 3) to cater for the additional demands arising. There is the potential to address such capacity issues through the provision of new community services and facilities alongside new housing development, or investment to expand existing services, although the ability to do so would depend upon funding and viability and the strength of the relationship between the development and the services to be provided. Whilst it is recognised that strategic development would deliver education/health/community facilities on site, in principle it is generally more sustainable and viable to firstly develop close to existing facilities, and help to expand them where required.

- 6.9 The greater the housing required under the options, the more likely that significant adverse effects would arise with respect to the environmental SA objectives. For example, under Options 1 to 3, which seek to cater for 100%, 50% and commuting-related need of all the neighbouring authorities, significant adverse effects would be experienced against all the environmental SA objectives 6 to 14, albeit sometimes mixed effects. If Mid Sussex District were to accommodate only Brighton & Hove's unmet needs and no other neighbouring authorities, this would be likely to result in significant adverse effects against all the environmental SA objectives, even if only half of the unmet need were to be provided for. Similarly, if Mid Sussex were to seek to cater for 100% of Tandridge's unmet needs alone, or 100% of Worthing's unmet needs alone, significant adverse effects against all the environmental SA objectives would be likely.
- 6.10 It is only for those neighbouring authorities that have low numbers of unmet housing needs, such as for Adur, Crawley, Lewes, Wealden, that the likelihood of significant adverse effects arising against the environmental SA objectives reduces, but this is on the assumption that only each authority's unmet needs and no others are provided for in Mid Sussex.
- 6.11 There is the alternative of meeting some but not all of the unmet need of a combination of neighbouring authorities (i.e. a mix of some of the options considered in this study). The Sustainability Assessment has shown that, across a range of SA objectives, similar effects would arise irrespective of which authorities' needs were to be met in Mid Sussex, with the significance of these effects dependent upon the total numbers of homes involved, and where in Mid Sussex these might be accommodated. For example, meeting a combination of the needs of the southernmost neighbouring districts would put greatest pressure and give rise to greatest effects on those locations identified in the Sustainability Assessment in the south of Mid Sussex - the same locations would be needed irrespective of the neighbouring authority.
- 6.12 A number of the options could give rise to significant positive effects against two of the economic SA objectives: SA objective 15 (To encourage the regeneration of the District's existing Town Centres and support the viability and vitality of village centres) and SA objective 16 (To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District). In such instances the economic benefits are likely to arise within Mid Sussex rather than within the authorities whose unmet housing needs are being met. These significant positive effects would be likely to be experienced under Options 1 to 3 (i.e. catering for 100%, 50% and commuting related unmet needs of all the local authorities combined), or when considering local authorities in isolation, Brighton & Hove (100% and mid-level unmet needs options), and Tandridge and Wealden (100% of unmet needs options only).
- 6.13 There is the risk that such economic activity could be diverted from neighbouring authorities to Mid Sussex, which may have implications for the local economies of those authorities, particularly if it encourages the employment pool to move to Mid Sussex. However, providing for housing is only one part of the equation, as there may not be enough jobs in Mid Sussex to cater for the new residents. This in turn depends upon not only the interest of businesses to invest in, and create, jobs in Mid Sussex, but also the availability of land and premises to cater for the additional economic development. Such additional economic development would have the potential to add to the effects identified in this Sustainability Assessment for additional housing. If there are not enough jobs in Mid Sussex to satisfy the employment needs arising from residents of the additional homes, the greater the likelihood that they will commute outside of the District.



- 6.14 In terms of travel patterns, it therefore makes more sense in sustainability terms to provide for housing within the local authority areas in which that need arises. If housing is provided in Mid Sussex District to meet the needs of another local authority, then this is likely to give rise to more commuting and hence road congestion, air pollution and carbon emissions from vehicles, traffic related noise etc. For some neighbouring authorities, such as Brighton & Hove and Crawley, public transport (particularly rail) links are very good, which could offset some of the increases in traffic. For others, where commuting journeys are more likely to be dispersed, or where public transport links are less attractive, the incentive to drive is likely to be greater. This is likely to be the case for some of the more rural authorities, or where public transport links are less amenable to use (e.g. between Mid Sussex and Worthing), and increased air pollution from increased car journeys could also have negative effects on the Ashdown Forest SAC/SPA, particularly in relation to the options to meet Wealden and Tandridge's unmet need. In Tandridge, the demand for more homes is primarily in the north of the District (due to its proximity to London), and therefore providing for unmet need south of Tandridge in Mid Sussex is less likely to meet the requirements of people wishing to live in Tandridge, particularly if they need to travel to London for work.
- 6.15 In conclusion, therefore, 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 requirement in the District Plan. In terms of prioritisation, it makes more sense to provide for the needs of those neighbouring authorities where the 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.
- 6.16 In all instances, the provision of housing in Mid Sussex to meet the unmet housing needs of other local authorities must be accompanied by adequate investment in the health, education, water, open space, infrastructure and other services required to support additional development. It will also be important to ensure that the effects of developing in Mid Sussex deliver greater positive effects and fewer negative effects than developing within the authorities where the needs arises, both on a comparative basis and in cumulative terms, and that any negative effects identified within the Mid Sussex are mitigated, while positive effects are maximised. Policies in the Mid Sussex District Plan as well as the neighbouring authorities' Local Plans will need to ensure infrastructure delivery is properly planned for and that adequate mitigation measures such as incorporation of sustainable design, construction and transport modes, protection and enhancement of biodiversity, heritage and landscape etc., are required within proposals for development locations allocated to accommodate the additional housing need.
- 6.17 This assessment has appraised the relative sustainability of each reasonable alternative put forward. There may be reasons why the most sustainable option may not be deliverable 'on the ground' – for example, it may not be possible to deliver the number of dwellings proposed by each option for viability or land availability reasons. As this report provides a high-level assessment, it will be for Mid Sussex District Council to make more detailed conclusions. This may be through reviewing individual site suitability/capacity through the Strategic Housing Land Availability Assessment (SHLAA) process.



## **Appendix 1**

### Brief Sustainability Assessment of the 11 broad potential development locations

## North of the High Weald AONB

Around Copthorne																	
Social					Environmental										Economic		
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-	+?	+/-	--	-	-?	-?	0	-	-?	-	-?	+	+	+	0
Potential Negative Effects									Potential Positive Effects								
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).									Development likely to be within reach of existing health facilities								
School capacity under pressure									Development could enhance existing retail provision								
Significant areas within Flood Zone 2 or 3									Development could encourage community cohesion (but may affect character of village)								
Large amounts of Grade 3 agricultural land									Not likely to have an impact on the historic environment								
Possible detrimental impact on the Ashdown Forest SAC/SPA and Copthorne Common SNCI									Could result in regeneration within Copthorne town centre.								
Possible impact on AONB due to close proximity									Could provide workforce close to existing employment opportunities (Crawley, Gatwick, East Grinstead) and sustain economic growth								
Limited public transport																	
Could increase amount of waste generated and energy used in the District.																	
Waste Water capacity issues at Crawley WwTW																	

Around Crawley Down																	
Social					Environmental										Economic		
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-?	+?	+/-	0	-	-?	-?	0	-	-?	-	-?	+	+	+	0
Potential Negative Effects									Potential Positive Effects								
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).									Development likely to be within reach of existing health facilities								
Potential capacity issues within educational system									Development could enhance existing retail provision								
Large amounts of Grade 3 agricultural land									Development could encourage community cohesion								

	(but may affect character of village)
Possible detrimental impact on the Ashdown Forest SAC/SPA	Not likely to have an impact on flood risk
Possible impact on AONB due to close proximity	Not likely to have an impact on the historic environment
Limited public transport	Could contribute to regeneration of Crawley Down town centre
Could increase amount of waste generated and energy used in the District.	Could provide workforce close to existing employment opportunities (Crawley, Gatwick, East Grinstead) and increased economic growth.
Waste Water capacity issues at Crawley WwTW	

East of Crawley																	
Social					Environmental								Economic				
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-?	+?	+	-	-?	-?	-	0	-	-?	-	-?	+	++	+	0
Potential Negative Effects									Potential Positive Effects								
There is a lack of suitable deliverable sites within this broad location, according to the SHLAA									Development likely to be within reach of existing health facilities								
Potential capacity issues within educational system									Development could enhance existing retail provision								
Some areas within Flood Zone 2 or 3									Development could encourage community cohesion								
Some Grade 3 agricultural land									Not likely to have an impact on the historic environment								
Adjacent to and could have a negative effect on the Oaken Wood SNCI									Could contribute to regeneration within Crawley town centre								
Impact on AONB as adjacent to boundary									Could provide workforce close to existing employment opportunities (Crawley, Gatwick, East Grinstead) and increased economic growth								
Limited public transport																	
Could increase amount of waste generated and energy used in the District.																	
Waste Water capacity issues at Crawley WwTW																	

South of Crawley																	
Social					Environmental									Economic			
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-?	+?	+	0	-?	-?	--	0	-	-?	-	-?	+	++	+	0
Potential Negative Effects									Potential Positive Effects								
There is a lack of suitable deliverable sites within this broad location, according to the SHLAA									Development likely to within reach of existing health facilities								
Potential capacity issues within educational system									Development could enhance existing retail provision								
Some Grade 3 agricultural land									Development could encourage community cohesion								
Could have effect on the adjacent Worth Forest SSSI									Not likely to increase flood risk								
Impact on AONB as is within AONB boundary									Not likely to have an impact on the historic environment								
Limited public transport									Could contribute to regeneration within Crawley town centre								
Could increase amount of waste generated and energy used in the District.									Could provide workforce close to existing employment opportunities (Crawley, Gatwick, East Grinstead) and help sustain economic growth								
Waste Water capacity issues at Crawley WwTW																	

Around East Grinstead																	
Social					Environmental									Economic			
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+	-	+	+	0	-	-?	-?	0	+?	-?	-	-?	+	++	+	0
Potential Negative Effects									Potential Positive Effects								
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).									Development within reach of existing health facilities								
School capacity under pressure									Development could enhance existing retail provision								
Large amounts of Grade 3 agricultural land									Development could encourage community cohesion								
Possible detrimental impact on the Ashdown Forest SAC/SPA									Not likely to result in increased flood risk								
Possible negative effect on AONB due to proximity									Not likely to have an impact on the historic environment								

Could increase amount of waste generated and energy used in the District.	Good public transport links
Waste water capacity issues at Crawley WwTW	Could result in the regeneration of the centre of East Grinstead
	Could provide workforce close to existing employment opportunities (Crawley, Gatwick, East Grinstead) and contribute to economic growth

## South of the High Weald AONB/North of South Downs National Park

Around Haywards Heath / Lindfield																	
Social					Environmental								Economic				
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+	-?	+	+	-	-	-?	-?	-?	+?	-?	-?	-?	+	++	+	0
Potential Negative Effects									Potential Positive Effects								
Potential capacity issues within educational system									There is a supply of housing in this broad location as identified in the SHLAA, whilst it is likely that this will be needed to contribute towards the District need (through allocations in relevant Neighbourhood Plans) there may be excess supply.								
Some areas within Flood Zone 2 or 3									Development could encourage community cohesion								
Large amounts of Grade 3 agricultural land									Development would be located near to existing health facilities								
Possible detrimental impact on the Ashdown Forest SAC/SPA and LNRs									Development could enhance existing retail provision								
Possible negative effect on AONB due to proximity									Good public transport links within Haywards Heath								
Possible negative effect on heritage assets within Haywards Heath									Could help to regenerate the centre of Haywards Heath								
Could increase amount of waste generated and energy used in the District									Could provide workforce close to existing employment opportunities (Haywards Heath and Burgess Hill) and contribute to economic growth								
Potential for capacity issues at Goddard's Green WWTW																	

Around Burgess Hill																	
Social					Environmental							Economic					
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+	-?	+	+	-	-	-?	-?	0	+?	-?	-?	-?	+	++	+	0
Potential Negative Effects					Potential Positive Effects												
Potential capacity issues within educational system					There is a supply of housing in this broad location as identified in the SHLAA, whilst it is likely that this will be needed to contribute towards the District need (through allocations in relevant Neighbourhood Plans) there may be excess supply.												
Some areas within Flood Zone 2 or 3					Development could encourage community cohesion												
Large amounts of Grade 3 agricultural land					Development would be located near to existing health facilities												
Possible effect on SDNP due to close proximity					Development could enhance existing retail provision												
Could increase amount of waste generated and energy used in the District					Not likely to have an impact on the historic environment												
Potential for capacity issues at Goddard's Green WWTW					Good public transport links												
					Could help to regenerate the centre of Burgess Hill												
					Could provide workforce close to existing employment opportunities (Burgess Hill, Haywards Heath) and contribute to economic growth												

Around Cuckfield																	
Social					Environmental							Economic					
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-?	+?	+/-	0	-	-?	-	-?	-	-?	-?	-?	+	+	+	0
Potential Negative Effects					Potential Positive Effects												
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).					Development could encourage community cohesion (but may affect character of village)												
Potential capacity issues within educational system					Development is likely to be within reach of existing health services												
Large amounts of Grade 3 agricultural land					Development could enhance existing retail provision												
Potential effect on LNR and SNCI					Not likely to result in increased flood risk												



Impact on AONB due to being adjacent to the boundary	Could help to regenerate the centre of Cuckfield
Conservation areas could be negatively effected	Could provide workforce close to existing employment opportunities (Haywards Heath, Burgess Hill) and contribute to economic growth
Limited public transport	
Could increase amount of waste generated and energy used in the District	
Potential for capacity issues at Goddard's Green WWTW	

Around Bolney																	
Social					Environmental								Economic				
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+?	-	+?	+/-	-	-	-?	-	-?	-?	-?	-?	-?	+	+	+	0
Potential Negative Effects									Potential Positive Effects								
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).									Likely to have some access to existing health services								
School capacity under pressure									Likely to have access to some existing retail provision								
Some areas within Flood Zone 2 or 3									Development could encourage community cohesion (but may affect character of village)								
Large amounts of Grade 3 agricultural land									Could contribute to the regeneration of the centre of Bolney								
Potential impact on nearby LNR and SNCI									Could provide workforce close to existing employment opportunities (Haywards Heath, Burgess Hill) and contribute to economic growth								
Some parts of broad location within AONB boundary																	
Conservation area within Bolney could be affected																	
Limited public transport																	
Could increase amount of waste generated and energy used in the District																	
Potential for capacity issues at Goddard's Green WWTW																	

Around Hurstpierpoint / Hassocks																	
Social					Environmental							Economic					
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	+	-	+	+/-	-?	--	-?	-	-?	+?	-?	-	-?	+	++	+	0
<b>Potential Negative Effects</b>									<b>Potential Positive Effects</b>								
Whilst there may be a supply of housing in this broad location as identified in the SHLAA, it is likely that this will be needed to contribute towards the District's need (through allocations in relevant Neighbourhood Plans).									Development highly likely to have access to existing health services								
School capacity under pressure									Development could enhance existing retail provision								
Some areas within Flood Zone 2 or 3									Development could encourage community cohesion (but may affect character of village)								
Large amounts of Grade 3 with some Grade 2 agricultural land									Good existing public transport links								
Possible impact on LNR and SNCIs									Could contribute to regeneration of Hurstpierpoint centre.								
Possible impact on SDNP as is adjacent to boundary									Could provide workforce close to existing employment opportunities (Hurstpierpoint, Burgess Hill, Haywards Heath) and contribute to sustaining economic growth.								
Could have a negative impact on the Langton Lane Conservation Area on the outskirts of Hurstpierpoint																	
Could increase amount of waste generated and energy used in the District																	
Potential for capacity issues at Goddard's Green WWTW																	

New settlement/Sayers Common																	
Social					Environmental							Economic					
1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
+?	-?	-	-?	+/-	--	-	-?	0	0	-	-?	-	-?	0	+	+	0
<b>Potential Negative Effects</b>									<b>Potential Positive Effects</b>								
Not likely to have access to existing health services									Development could encourage community cohesion due to creation of new settlement (but may affect character of nearby villages, e.g. Sayers Common)								

Not likely to have easy access to existing schools and those in nearby settlements under pressure	Unlikely to have an effect on protected landscapes
Not likely to have existing retail provision	Not likely to have an impact on the historic environment
Significant areas within Flood Zone 2 or 3	Could potentially provide workforce within reach of existing employment opportunities (Hurstpierpoint) and contribute to sustaining economic growth.
Large amounts of Grade 3 agricultural land	
Limited public transport	
Could increase amount of waste generated and energy used in the District	
Potential for capacity issues at Goddard's Green WWTW	

# Appendix 2

## Detailed Sustainability Assessment Matrices for the 25 Options



Options:																		
1: Meet full unmet need of all LPAs (37,733)																		
2: Meet 50% unmet need of all LPAs (18,367)																		
3: Meet all unmet need based on travel to work data (13,572)																		
4: Meet all unmet need based on internal migration data (2,761)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• South of Crawley</li> <li>• Around East Grinstead</li> <li>• Around Haywards Heath</li> <li>• Around Burgess Hill</li> <li>• Around Cuckfield</li> <li>• Around Bolney</li> <li>• Around Hurstpierpoint</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
1	++	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
2	++	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
3	+	+/- ?	+/- ?	++	++/-	--?	--	--?	+/- ?	+/- ?	+/-	--	--?	--	++	++	+/-	0
4	+/-	+/- ?	+/- ?	+	+/-	-?	-	-?	+/- ?	+/- ?	+/-	-	-?	-	+	+	+	0

## Summary of Appraisal:

### Social:

All the options considered will provide additional housing to meet some or all of neighbouring authorities unmet housing need and therefore have a positive effect on **SA Objective 1** to varying degrees. This effect will be significant for Options 1 and 2 as all or at least half of the surrounding LPAs' unmet need would be met. Although Option 3 would also provide a high level of additional housing (13,572 homes in total) as this figure is based on current commuting patterns, for some neighbouring authorities this represents around two thirds of their unmet housing (Adur, Crawley and Wealden) for others, less than 15% of their unmet need would be met (Tandridge and Worthing), therefore only a minor positive effect is expected. Option 4 is based on past internal migration patterns and would only provide 2,761 additional homes in Mid Sussex, which would mean providing for less than a third of the unmet need for Brighton & Hove, Crawley Tandridge and Adur (between 3 and 30%), and none of the unmet need for Worthing, Horsham, Lewes and Wealden. Given the high level of unmet housing need in Option 4 a mixed (minor positive and minor negative) effect is expected on this SA objective. For all options the impact would be more positive if a provision is made for the delivery of affordable housing. In addition, while in theory, Options 1 and 2 would have a significant positive effect in terms of meeting neighbouring authorities' unmet housing needs, in practice these options would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet these option numbers in full.

Some of the broad locations that have been identified as being able to accommodate additional development for the seven surrounding LPA's unmet housing needs are located around existing settlements such as Crawley, Crawley Down, Copthorne, East Grinstead, Hurstpierpoint, Burgess Hill and Haywards Heath, which have good existing access to services, including health services (including hospitals in Crawley, East Grinstead and Haywards Heath) and open space facilities. Development at the potential new market town near Sayers Common is less likely to provide good access to these services in the early stages of the development; however this location would provide immediate access to the wider countryside. The District is connected to the Sustrans National Cycling Route which runs from north to south from Crawley, through Bolney and Hurstpierpoint and east to west from Crawley to East Grinstead connecting numerous open spaces along the way. Housing development proposed in Option 1, Option 2, Option 3 and Option 4 may therefore have an uncertain minor positive effect on **SA Objective 2** given that the exact locations of development are not known at this stage. However, significant additional development (under Options 1- 3) could have a significant negative effect on access to health facilities in the area due to the increased pressure on facilities.

All the main settlements and a large number of villages have a school in the District within walking distance, with 27 primary and seven secondary schools serving the District. Varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in Hurstpierpoint, Haywards Heath, east Grinstead and Burgess Hill<sup>18</sup>. The potential new market town development near Sayers Common would provide nearby access to an existing school for children with learning difficulties but no other educational facilities are currently provided at this location. Current access to schools varies between good (at Hurstpierpoint, Haywards Heath and Burgess Hill) to poor (at the potential new market town development near Sayers Common), but minor positive effects are likely for all the options as there should be some access to existing school places in the broad locations where additional development might be located. This may be more difficult to achieve under Option 4, which would provide much lower levels of housing, and therefore the additional housing may be more spread out among the potential development locations, meaning that it may not provide sufficient new

<sup>18</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

housing in any one location to support the need for new schools. Significant additional development (under Options 1- 3) at these locations could have a significant negative effect on access to schools in the area (many of which are already close to capacity), due to the increased pressure for school places. Therefore, mixed effects are predicted on **SA objective 3**. The effects would be more certain if it was known if development would result in any additional education facilities being provided, for example through developer contributions.

The potential broad development locations for meeting the surrounding LPA's unmet housing needs around Copthorne, Cuckfield, East Grinstead, Haywards Heath, Hurstpierpoint, Burgess Hill, Bolney and Crawley Down will provide good access to retail and community facilities as they are within close proximity of existing urban areas. Similarly the potential development location to the east of Crawley is situated on the east edge of the settlement of Crawley providing relatively convenient access to retail and community facilities, although the potential development site to the south of Crawley would be separated from existing development by the M23. The potential new market town near Sayers Common will not initially provide access to existing retail and community facilities; however these facilities may be included with any development proposed. Options 1, 2 and 3 (with provision for 37,733, 18,367 and 13,572 homes respectively) would result in very high numbers of houses being provided in close proximity to existing retail and community facilities and would also be likely to provide new facilities, thus a significant positive effect is expected on **SA objective 4**. Option 4 will provide a reduced number of homes (2,761) in comparison and therefore a minor positive effect is expected for this option.

Options 1 to 4 provide for levels of housing at a number of different locations in the Mid Sussex District. The Mid Sussex District Plan 2014-2031 Consultation Draft has identified a number of settlements as towns (Haywards Heath, Burgess Hill and East Grinstead), and villages (Hurstpierpoint, Crawley Down and Cuckfield). Any settlements not recognised as such are recognised as being smaller villages or new development locations. Housing is to be allocated around settlements identified as towns, villages, smaller villages and new development locations in Option 1, Option 2, Option 3 and Option 4. As such it is thought that housing development carried out around larger towns will have a positive effect on community cohesion. This is because it is thought that demand for additional housing may already exist at these locations and the provision of housing in close proximity may discourage families from leaving the area. In contrast providing high levels of housing at smaller village locations may be of detriment to community cohesion as there is less likely to be demand for housing in the area and in addition the high level of housing provided may adversely affect smaller village's character. Therefore, it is expected that Option 1, Option 2 and Option 3 will have both significant positive and significant negative effects on **SA objective 5** given the high levels of housing provided for. Option 4 is expected to have a minor positive and minor negative effect on this SA objective as lower levels of housing are provided.

#### Environmental:

Of the potential development locations identified to meet the surrounding LPA's unmet housing need in Mid Sussex, Hurstpierpoint, Burgess Hill, Haywards Heath and Copthorne as well as the potential new market town near Sayers Common have been identified as having areas of land within their boundaries which are at high risk of flooding (Flood Zone 3). Therefore, the level of additional homes to be provided under any of the options could have a negative effect on **SA objective 6**. Given the very high levels of additional housing proposed in Options 1, 2 and 3 it may be difficult to find appropriate sites within the broad potential development locations which would not result in housing being placed in areas of high flood risk. As the specific development sites have not yet been selected an uncertain significant negative effect is expected on this SA objective for these options. As Option 4 proposes lower numbers of housing overall, an uncertain minor negative effect is expected on reducing flood risk in Mid Sussex.

Much of the land in the broad locations that could be used to meet the surrounding LPA's unmet housing need (around East Grinstead, Haywards Heath, Burgess Hill and Hurstpierpoint) has been classified as Grade 3 agricultural land and is therefore considered to be good quality land. Additionally land within the broad development location to the south west of Hurstpierpoint has been designated as Grade 2 agricultural land. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land would result in a significant negative effect on **SA objective 7**. This would be most likely under Options 1, 2 and 3, as the very high number of additional housing that would need to be provided in the District means that all of the broad locations, including south west of Hurstpierpoint would be more likely receive some additional development. As the area of Grade 2 agricultural land is quite small and development could be situated in other areas (for example on Grade 4 agricultural land near Cophorne or non-agricultural land to the south of Crawley for example), Option 4, which proposes lower levels of additional development is only expected to have a minor negative effect on this objective.

The broad locations for development of the surrounding LPAs' unmet housing need within Mid Sussex District are in areas which potentially may have a negative effect on **SA objective 8** either through development itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. In the area south of the High Weald AONB (where 27,159, 13,580, 9,260 or 2,064 houses would be provided under Options 1 to 4 respectively) there are a number of sites of nature conservation importance (SNCIs) within the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood Complex and Meadows and Orchard Wood to the west, Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill, and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer would also act as a constraint to the northern part of the area around Haywards Heath. The potential new market town near Sayers Common is in close proximity to a number of small pockets of ancient woodland (Laundry Wood, Collins Barn Shaw and Paddock Wood) which may constrain development given that there must be a 15m buffer between this biodiversity feature and new development. To the north of the AONB development proceeding at the area east of Crawley, as well as at the potential development locations around Crawley Down, Cophorne and East Grinstead could have a detrimental effect on Ashdown Forest SAC and SPA, which are sensitive to air pollution (significantly acid deposition and eutrophication by nitrogen deposition)<sup>19</sup>. If the District was to accept some or even all of the surrounding LPAs' unmet housing need as specified by Options 1, 2, 3 and 4 (which would require 11,574, 5,787, 4,312 or 697 homes respectively to be built north of the AONB) an increased number of commuter journeys by car could result from the potential development locations north of the AONB, with new residents potentially still having jobs at Crawley's, Wealden's and Tandridge's employment sites to the north, east and west. Journeys to Wealden in particular could be of most detrimental effect to the Ashdown Forest given its sensitivity to air pollution, as this would involve journeys close to the SPA and SAC itself. A 7km zone of influence around Ashdown Forest has also been established given that the majority of visitors to the Forest travel from the nearby vicinity. Bird species are vulnerable to disturbance by visitors, and as East Grinstead and Crawley Down are within this zone of influence a significant negative effect is expected on this SA objective if Options 1, 2 or 3 were followed, due to the higher number of homes that would need to be developed at locations north of the AONB under these options. Option 4 requires fewer homes to be developed, and therefore the effect is considered to be minor negative. As alternative sites may be found within the potential development locations that could help to avoid wider effects on biodiversity and sensitive nature conservation sites, the negative effects on SA objective 8 are uncertain.

There are likely to be mixed effects on **SA Objective 9**, as some of the broad potential development locations are directly adjacent to the nationally protected landscapes of The High

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<sup>19</sup> Habitats Regulations Assessment for the Mid Sussex District Plan, May 2013, UE

Weald AONB (areas surrounding Haywards Heath, East Grinstead, Crawley Down and Bolney) and the South Downs National Park (area surrounding Hurstpierpoint). Development of large numbers of additional homes around these settlements may have an adverse effect on the setting of these landscapes. Additionally the broad location to the south of Crawley is within the High Weald AONB, and would therefore have a significant negative effect on this objective if it were to be developed. This would be more likely under Options 1, 2 and 3 given the higher levels of housing that would need to be located in the District. However, positive effects could also occur on this SA objective through more households having good access to areas of open green space, therefore, mixed effects are recorded. As specific locations for the development are currently unknown the overall effects are recorded as uncertain.

As the potential broad development locations have been identified for the most part around existing urban centres a number of heritage assets may act as constraints to the housing proposed. The potential development location at Haywards Heath could potentially be constrained by and have impacts upon seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Similarly, development at Burgess Hill has the potential to impact upon Silverdale Road/ Birchwood Grove Road, St John's and Fairfield conservation areas. Potential development around the Hurstpierpoint may be constrained by the conservation areas at Keymer, Hurst Wickham, Hurstpierpoint centre, and Langton Lane. The potential new market town near Sayers Common would be unaffected by heritage constraints in Mid Sussex District, however, there are some listed buildings located in close proximity to the wider development location for the new market town within Horsham District. Cuckfield has two conservation areas which may be impacted upon by any development: the central Cuckfield and Whitemans Green conservation area to the north west. In East Grinstead development may be constrained by the East Grinstead conservation area and Estcots and East College Lane conservation area in the centre of the settlement. The registered gardens of Standen and Brockhurst are to the south of the settlement. Any proposed development may be constrained by and impact upon by the Bolney conservation area in the village. Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for all options on **SA objective 10**, although due to the higher number of houses that would need to be delivered under Options 1, 2 and 3, it is more likely to be difficult to avoid adverse effects on heritage assets, so a significant negative effect is recorded for this option. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design, which is also uncertain.

Many of the broad locations identified for development are in areas where there is existing public transport provision which may result in a positive effect on **SA objective 11**. For example, there are good rail and bus links between Crawley and East Grinstead, Burgess Hill and Haywards Heath. Furthermore the District is well connected by road and rail to London, Brighton and Gatwick and is within easy travelling distance of the Channel Tunnel, Southampton and Dover. Negative effects will occur for those broad development locations where there is no existing public transport infrastructure, as more households will use private cars for transportation. This is more likely to be the case in the villages without train stations (i.e. Bolney, Hurst, Cuckfield, Copthorne, Crawley Down). In addition, in the potential new market town near Sayers Common and the development location to the south of Crawley it is unlikely that good public transport infrastructure will exist at the early stages of these developments. High levels of out commuting already exist within the District (around 45%), and overcrowded trains and congestion on the road network is an issue<sup>20</sup>. Travel to work data shows that when considering the District's direct neighbours (Horsham is included in these figures and Worthing is not) 17,745 workers travel out of the District to these locations compared to 14,895 workers who travel in the opposite direction. In total there is a net outflow of 2,850 commuters from the District to its neighbours. Options 1, 2 and 3 would involve providing housing for a higher number of new residents who may have to commute out of

<sup>20</sup> Mid Sussex District Plan Sustainability Appraisal (Incorporating Strategic Environmental Assessment) Scoping Report, July 2014, Mid Sussex District Council



the District for work, which, if public transport capacity was not sufficient, would impact upon road congestion and air pollution levels in the District. In particular, negative effects on air pollution may occur around the Hassocks AQMA if there was more development in the broad location around Hurstpierpoint. In terms of reducing road traffic, a significant negative effect is expected on SA objective 11 for Options 1, 2 and 3, and so the overall effect is mixed as some new residents are likely to make use of public transport. Option 4 proposes a lower number of additional houses in the District (2,761) therefore the effect on increased road journeys and air quality may not be significant. In addition, if the new homes were provided in the broad locations where good transport links already exist in the District, then positive effects might also be achieved, and so a mixed minor positive and negative effect is expected for this option.

The location of additional housing should not have an effect on **SA objective 12** i.e. the level of waste produced, re-used or recycled by householders. However, given the high levels of additional housing proposed in Options 1, 2 and 3, there is likely to be a significant increase in the total level of waste generated within the District under these options, and therefore a significant negative impact on **SA objective 12** is expected for these options. As the level of housing that would be provided under Option 4 is considerably lower, a minor negative effect is expected. The effect of all options is thought to be uncertain as the increase in the levels of waste produced may be mitigated through the implementation of recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Provision of higher numbers of homes in Mid Sussex are likely to put further pressure on the District which is already identified as 'water-stressed' with regard to water supply. Burgess Hill is highlighted as an area with problems relating to waste water treatment capacity. Goddards Green Wastewater Treatment Works (Burgess Hill area) has issues with environmental capacity above and beyond District Plan housing requirement for this area (i.e. Burgess Hill Strategic Sites and Neighbourhood Plan scale development) although does have physical capacity. Currently the majority of waterbodies in the District are failing to meet the Good Status Water Framework Directive objective and existing sewerage infrastructure within the District is operating at or near capacity posing a potential risk to water quality. Although Crawley waste water treatment works which serves part of Mid Sussex has recently been upgraded to accommodate projected growth until 2021, it is to serve the strategic developments at Crawley. The Environment Agency and Thames Water have highlighted issues relating to the identification of any more strategic sites coming forward in this location until post 2021. This suggests development around Crawley could be constrained by water quality concerns. Considering the District as a whole the relevant water companies are confident that if additional wastewater treatment capacity is required to accommodate growth to be provided in the District Plan, then this capacity can be planned, funded and delivered through the water industry's price review process. Despite this, given the existing pressure that exists on the District's water supply and water quality, an uncertain significant negative effect is identified for **SA objective 13** for Options 1, 2 and 3 given the large increases in housing within the District that would occur. Given the reduced number of houses that would be delivered in Option 4, a minor but uncertain negative effect is anticipated.

At present the District faces the key energy issues of contributing to fulfilling national and local renewable energy targets and reducing CO<sub>2</sub> emissions while accommodating increased housing numbers<sup>21</sup>. The high levels of housing proposed in Options 1, 2 and 3 could therefore result in a significant negative impact on **SA objective 14**. Although the location of these additional houses may not directly impact upon energy efficiency or the use of renewable sources, the increase in demand on energy supply which is currently not fulfilled by renewable energy is predicted as having an adverse effect. The reduced numbers of houses proposed in Option 4 will have a minor negative effect on this SA objective.

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<sup>21</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

### Economic:

As Options 1, 2 and 3 include all the potential development locations around existing town and village centres and will lead to high levels of housing being supplied within walking distance of a town or village centre (with the exception the potential new market town development near Sayers Common and the potential development location to the south of Crawley), a significant positive effect for these options is expected on **SA objective 15** (supporting viability and vitality of town centres). Option 4 will provide for a reduced number of homes around existing centres and therefore a minor positive effect is expected on this SA objective for this option.

Although Options 1, 2 and 3 will not leading to the immediate creation of new jobs in these areas, considering that these options will provide high numbers of houses at the potential development locations in close proximity to existing urban centres (i.e. Crawley Down, Copthorne, East Grinstead, Cuckfield, Bolney, Burgess Hill, Hayward Heath and the area east of Crawley) a significant positive effect is expected on **SA objective 16**. The high levels of housing proposed should provide good access to existing employment centres for a significant number of new residents. As Option 4 provides for less housing a minor positive effect is expected on this SA objective. However, these effects are uncertain as there may not be sufficient existing employment opportunities to meet the additional demand. In addition, the potential new market town development near Sayers Common would not have immediate access to employment sites; although it is likely that new employment opportunities would be provided within the new settlement, in the short term, new residents would probably have to commute further afield for employment, and may be likely to return to the neighbouring authorities for their employment.

Options 1 to 3 are considered as having mixed positive and negative effects on **SA objective 17**. While the development of housing in the District is seen as an economic activity in its own right, potentially providing job opportunities and increasing demand for services in the area, it is also noted that additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for new residents. As such positive and negative effects are expected for Option 1, Option 2 and Option 3 which provide higher levels of housing. Option 4 provides lower levels of housing and is not expected to place as much pressure on the requirement for additional employment land meaning a minor positive effect only is expected.

The effect of all options on **SA objective 18** is expected to be negligible as satisfying of the surrounding LPAs' unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

### **Overall Conclusion:**

Options 1 and 2 would make a significant contribution to meeting the seven neighbouring authorities' unmet housing need (either all or half of the unmet need respectively), and therefore would have significant positive effects for social and economic objectives such as provision of housing, ensuring access to services and existing employment opportunities and encouraging viability of town centres. Option 3 would also make provision for around half to two thirds of the unmet need of Adur, Crawley, Lewes and Wealden and thus could also have significant positive effects on access to services and existing employment opportunities and encouraging viability of town centres. However, in practice, these effects would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet these option numbers in full, as they would all need to provide well over 5,000 additional homes on top of Mid Sussex District's own housing need. Option 4, which is based on past migration patterns would have the least positive social and economic effects as it would only contribute to meeting between 9 and 30% of Adur, Tandridge, Crawley and Brighton & Hove's unmet need, and would not provide for any of Lewes, Wealden and Worthing's unmet need. Therefore, mixed minor negative and positive effects are identified for the social objectives in relation to Option 4.

Despite the positive social and economic effects of the four options, there could be a number of potentially significant negative environmental effects within Mid Sussex due to development in proximity to sensitive environmental features (including designated sites, areas of high flood risk and high grade agricultural land), but adverse effects could also occur on nature conservation sites, landscapes and heritage features within the neighbouring authorities as well. A number of these effects might be avoided depending on the specific location of the additional dwellings required. However, these effects are more likely to be significant under Options 1 to 3 due to the very high numbers of additional housing that would be required within Mid Sussex, and therefore the more development locations that would be required. In addition, there could be significant pressure placed on existing schools and health facilities within the main settlements of Mid Sussex unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. Potential negative social and environmental effects would be minor under Option 4 due to the significantly lower level of housing that would be provided.

Options: Adur																		
5. Meet all Adur's unmet need (1,160 houses)																		
6. Meet 50% of Adur's unmet need (580 houses)																		
7. Meet Adur's unmet need based on Internal Migration data (30 houses)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental										Economic		
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
5.	++	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
6.	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
7.	0	+	+?	+	0	0	0	0	+?	0	0	0	0	0	+	+	+	0

## Summary of Appraisal:

### Social:

Development proposals which would provide additional housing in the District to meet Adur District's needs are expected to have a positive effect on **SA objective 1**. If Mid Sussex District meets all of Adur District's housing needs (Option 5) a significant positive effect is expected on this SA objective given the high number of houses specified (1,160) and considering that the shortfall in housing will be entirely satisfied. If Mid Sussex was to meet 50% of Adur District's housing needs (Option 6 - 580 dwellings) a minor positive effect is expected. Although a large number of houses are proposed in this option, half of Adur's housing need remains unmet. Option 7 provides that Mid Sussex meet's Adur's need based on past Internal Migration data which equates to 30 houses. Given that 1,160 houses will still be required to meet Adur's housing needs under Option 7, the impact on this SA objective is considered to be negligible. For all options the impact would be more positive if a provision is made for the delivery of affordable housing.

The effect expected on **SA objective 2** will depend on the specific sites chosen for development. Any of the options should have a minor positive effect on this SA objective as the broad locations where housing might be provided are around the existing urban areas of Hurstpierpoint, Hassocks, Burgess Hill, Haywards Heath and Lindfield, which already provide nearby access to multiple health services, as well as leisure and open space facilities. The potential new market town development near Sayers Common however is not within proximity of existing health facilities. The overall effect is therefore noted as an uncertain minor positive; the effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities. The effect is noted as uncertain as the exact location of development is unknown at this stage.

All the main settlements and a large number of villages have a school in the District within walking distance, with 27 primary and seven secondary schools serving the District. Varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in Hurstpierpoint, Haywards Heath and Burgess Hill<sup>22</sup>. The potential new market town development near Sayers Common would provide nearby access to a school for children with learning difficulties but no other educational facilities are currently provided at this location. As such, given that current access to schools varies between good (at Hurstpierpoint, Haywards Heath and Burgess Hill) to poor (at the potential new market town development near Sayers Common), then major development (Option 5 and Option 6) at these sites could have a negative effect on access to schools, due to increase in population leading to an increase in pressure for school places. Option 7 which would lead to the development of 30 dwellings in Mid Sussex is considered to have a negligible effect on access to schools in the District (**SA objective 3**). A minor positive effect is expected for all options on the first part of the objective, as development within the District at the potential development sites will be in close proximity to schools which already exist. Considering the increase in pressure on access to schools in the area (many of which are already close to capacity) that would result from Option 5 and Option 6 mixed effects are predicted for these options. An overall minor positive effect on SA objective 3 is expected for option 7 as development is most likely to be located near existing education facilities and the additional 30 dwellings is expected to have a negligible effect on pressure for school spaces. The effect would be more certain if it was known if development would result in any additional education facilities being provided, for example through developer contributions.

The potential broad development locations for meeting Adur's unmet need around Hurstpierpoint,

<sup>22</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC



Haywards Heath and Burgess Hill will provide good access to retail and community facilities as they are within existing urban areas. Dwellings provided at the potential new market town development near Sayers Common would not be in close proximity to an existing town centre or community facilities. Residents here would be likely to travel to nearby settlements to access such facilities although it should be noted that new facilities may be delivered as part of the potential new market town development near Sayers Common. Overall a minor positive is expected on **SA objective 4** irrespective of how much of Adur's housing need is met in Mid Sussex.

The Mid Sussex District Plan 2014-2031 Consultation Draft has identified a number of settlements as towns (Haywards Heath and Burgess Hill) and villages (Hurstpierpoint/Hassocks). It is thought that development provided at larger settlements such as towns will have a positive effect on **SA objective 5** given that a demand for additional housing may exist in the area and that the provision of homes at these locations may encourage local families not to leave the District, thus promoting community cohesion. In contrast the provision of high levels of housing around small villages is expected to have a negative effect on community cohesion given that there is unlikely to be a large existing demand for houses at these locations and that the development of high numbers of homes may negatively impact upon smaller villages' character. As such, given that they would provide for housing at locations which are larger towns, smaller villages and new development locations, Option 5 and Option 6 are expected to have both minor positive and minor negative effects on this SA objective. Given the lower number of houses provided for by Option 7 (30 houses over 20 years) any potential negative effect on village character is likely to be avoided, and there is likely to be a negligible effect on community cohesion.

#### Environmental:

All of the potential development locations identified for meeting Adur's housing needs include areas at high risk of flooding (Flood Zone 3). Therefore, the level of additional homes to be provided under any of the options could have a negative effect on **SA objective 6**. However, it is likely that specific development sites could be found around Hurstpierpoint, Haywards Heath, Burgess Hill and the potential new market town development near Sayers Common which are not in Flood Zone 3. Therefore the effect on this SA objective is likely to be minor negative but uncertain, but negligible for Option 7, as it would only require 30 dwellings to be provided.

The potential development locations for Option 5, Option 6 and Option 7 could result in the loss of greenfield land either around existing settlements (Hurstpierpoint, Hayward Heath and Burgess Hill) or at the potential new market town near Sayers Common. The broad areas include mainly Grade 3 agricultural land or urbanised land. Land within the broad development location to the south west of Hurstpierpoint has however been designated as Grade 2 agricultural land. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land during any development means that a negative effect is expected on **SA objective 7** in particular for Option 5 and Option 6, as they would require more of Adur's unmet housing need to be delivered within the broad locations. As the area of Grade 2 agricultural land is quite small and development might be situated in other areas where it would not affect the appropriate use of this land the negative effect is recorded as uncertain. However, as Option 7 only requires 30 dwellings to be provided across the plan period it is unlikely that the Grade 2 agricultural land would be needed, therefore Option 7 would have a negligible effect on this objective.

There are six Local Nature Reserves in the Mid Sussex District which cover a total area of 132 hectares. Additionally 51% of the area of SSSIs within the District are in favourable condition giving an indication of the spread of important biodiversity features in the District and the condition they are in. The broad locations for development of Adur's unmet housing need are in areas which potentially may have a negative effect on **SA objective 8** either through development itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. There are a number of sites of nature conservation importance (SNCl) and within

the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood Complex and Meadows and Orchard Wood to the west, Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill, and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer would also act as a constraint to the northern part of the area around Haywards Heath. The potential new market town near Sayers Common is in close proximity to a number of small pockets of ancient woodland (Laundry Wood, Collins Barn Shaw and Paddock Wood) which may constrain development given that there must be a 15m buffer between this biodiversity feature and new development. Overall, a minor negative effect is expected on SA objective 8 for Option 5 and Option 6 given that the numbers of dwellings proposed in these development options are quite large, therefore, it may be difficult to avoid increased disturbance or damage to sensitive habitat locations within the broad locations identified. A negligible effect is expected on biodiversity for Option 7 as the number of houses is significantly reduced (30 dwellings over the whole plan period), therefore, it is likely that effects on biodiversity could be avoided under this option. As any of the development might be able to be located away from sensitive biodiversity features a degree of uncertainty is attached to the effects for Option 5 and Option 6.

Option 5 and Option 6 are likely to have mixed effects on **SA objective 9**, as some of the broad potential development locations that could be used to meet Adur's unmet need are directly adjacent to the nationally protected landscapes of The High Weald AONB (area surrounding Haywards Heath) and the South Downs National Park (areas surrounding Hurstpierpoint and Burgess Hill). Additional development at these locations may have a detrimental effect on the setting of these landscapes. These locations would however provide easy access for residents to high quality green space and as such positive and negative effects are expected for Option 5 and Option 6 given the high level of development specified. The potential new market town development near Sayers Common is not in close proximity to any nationally protected landscape areas but would provide new residents ease of access to the wider countryside given that it is not located within an excessively urbanised area. As Option 7 provides for a reduced number of dwellings the detrimental impact upon the nationally protected landscapes is seen as negligible given that it will be easier to locate housing within areas where impact is reduced and potential exists to mitigate negative visual impact (e.g. through sensitive design, screening etc.). Option 7 will still allow for ease of access for this reduced number of new residents to green space however and a minor positive effect is recorded. The effect on this SA objective would be more certain if the specific location of development was known.

In total there are 36 conservation areas and over 1000 listed buildings in the District. The potential development location at Haywards Heath could potentially be constrained by and have impacts upon seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Similarly, development at Burgess Hill has the potential to impact upon Silverdale Road/ Birchwood Grove Road, St John's and Fairfield conservation areas. Potential development around the Hurstpierpoint may be constrained by the conservation areas at Keymer, Hurst Wickham, Hurstpierpoint centre, and Langton Lane. The potential new market town near Sayers Common would be unaffected by heritage constraints in the Mid Sussex District, however, there are some listed buildings located in close proximity to the wider development location for the new market town within Horsham District. Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for all options. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design; and the number of houses supplied should not lead to any variation of this, however, it is more likely that impacts on heritage features could be avoided under Option 7 due to the limited number of additional houses that would need to be delivered, therefore it is likely to have negligible effects on SA objective 10. The effects on **SA objective 10** are uncertain for Options 5 and 6 as the location and design of the development is unknown.

The acceptance of 100% and 50% of Adur's unmet housing needs under Option 5 and Option 6 may result, at least initially, in increased levels of commuting between the two districts as new residents may still be employed in Adur. It is noted that there are strong public transport (rail) connections between the existing settlements and broad potential development locations surrounding Haywards Heath, Burgess Hill and Hurstpierpoint/Hassocks with each location having at least one train station. However, the service between these stations and Adur District is not as frequent as the London-Brighton line, and occasionally not direct. As such an increase in car use might be expected with regards any potential commuting to Adur District from those who have recently relocated to Mid Sussex. This increase is anticipated as being minor however, as presently there are no strong commuting or migration links between the two authorities (in 2011 the net flow of commuters between the two authorities was towards Mid Sussex with 779 commuters travelling into and 334 commuters travelling out of the District). Any increased commuting between the two authorities is considered to be of a short distance as the potential development areas identified in Option 5, Option 6 and Option 7 are to the south of Mid Sussex in relative proximity to Adur. However, this increase in the numbers of those commuting between the two authorities would most likely result in increased travel across the South Downs National Park which may be of detriment to this protected landscape. In addition, the potential new market town near Sayers Common is unlikely to have a good public transport infrastructure in the early stages of the development. There is also one AQMA in the District located near to the broad potential development location around Hurstpierpoint at the crossroads of Hurst Road, Keymer Road, Brighton Road and London Road, Hassocks. Development at this location could therefore have a negative effect on air pollution in this location. As such mixed effects may be expected on **SA objective 11** for all options except Option 7 in which increases in commuting levels are considered to be negligible due to the low number of dwellings to be provided (30 over 20 years).

The location of additional housing should not have an effect on **SA objective 12**, i.e. the level of waste produced, re-used or recycled by householders. However, if the District was to accept a significant amount of Adur's unmet housing needs as specified in Option 5 and Option 6 (1,160 houses and 580 houses respectively) it would most likely lead to an increase in the amount of waste the District as a whole would produce. As such a negative effect is expected to result on this SA objective if Option 5 or Option 6 is implemented. Given the low number of dwellings projected in Option 7 a negligible effect is expected on SA objective 12. The effect on this SA objective is uncertain as mitigating increasing levels of waste production may be possible through improved recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Water supply deficit is currently a recognised problem in the District as it and other authorities in the south east of England are classified by the Environment Agency as 'water-stressed'. There are also no new water resource options (e.g. groundwater sources, water transfer schemes, new reservoirs etc.) located within Mid Sussex. Burgess Hill is highlighted as an area with problems relating to waste water treatment capacity. If additional wastewater treatment capacity is required to accommodate growth to be provided in the District Plan, then this capacity can be planned, funded and delivered through the water industry's price review process<sup>23</sup>. As such given the existing pressure that exists on the District's water supply and water quality it is recognised that high increases in housing within the District (as would occur under Option 5 and Option 6) could have a negative effect on **SA objective 13**. Given the limited number of houses that would be delivered in Option 7, a negligible effect is anticipated.

**SA objective 14** which seeks to increase energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex is unlikely to be affected by accepting more or less of Adur's unmet housing need. However, proceeding with

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<sup>23</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

Option 5 or Option 6 which will lead to higher levels of housing in the south of the District (1,160 and 980 dwellings respectively) may result in an overall increase in demand on energy production; therefore a minor negative effect is expected for these options, but a negligible effect for Option 7.

Economic:

As all three options include potential development areas around existing town centres (Hurstpierpoint, Haywards Heath and Burgess Hill) and to a varying degree will lead to the number of households within walking distance of a town centre (with the exception the potential new market town development near Sayers Common) being increased, a minor positive effect is expected on **SA objective 15** for all options.

All options will have a minor positive effect on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Hurstpierpoint, Haywards Heath and Burgess Hill) where existing employers are based. Only the potential new market town development near Sayers Common will not have immediate access to employment sites; although it is likely that new employment opportunities would be provided within the new settlement, in the short term, new residents would probably have to commute further afield for employment.

Option 5, 6 and 7 provide for varying levels of housing in the District. The development of housing provides opportunities for job creation and may increase the demand of services in the District. It is considered that the levels of housing provided by Option 5, 6 and 7 will therefore result in a minor positive effect on **SA objective 17**.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Adur's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

**Overall Conclusion:**

There could be a number of potentially negative effects particularly on environmental receptors if Mid Sussex District were to deliver all or half of Adur's unmet housing need (Options 5 and 6). However, a number of these effects could be avoided depending on the specific location of the additional dwellings required. In addition, there could be pressure placed on existing schools within Haywards Heath, Burgess Hill and Hurstpierpoint unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. Effects would be slightly lower under Option 6 (delivering half of Adur's unmet need) than under Option 5 (all of Adur's unmet need). Option 7 would only deliver 30 houses over the 20 year plan period, therefore, the effects of this option are mostly negligible or minor positive. In particular, it would have a negligible effect on contributing towards meeting the unmet housing need for Adur.

Options: Brighton & Hove																		
8. Meet all of Brighton & Hove's unmet need (10,800)																		
9: Meet Brighton & Hove's unmet need based on Travel to Work data (4,008)																		
10: Meet Brighton & Hove's unmet need based on Internal Migration data (2,200)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment levels	17 – Sustain Economic Growth	18 – Encourage Tourism
8	++	+/- ?	+/- ?	+	++/-	--?	--?	--?	+/- ?	+/- ?	+/-	--?	--	--	++	++	+/-	0
9	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0
10	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0



## Summary of Appraisal:

### Social:

Development proposals which would provide additional housing in the District to meet the City of Brighton & Hove's needs are expected to have a positive effect on **SA objective 1**. If Mid Sussex District meets all of the City of Brighton & Hove's housing needs (Option 8) a significant positive effect is expected on this SA objective given the high number of houses specified (10,800) and considering that the shortfall in housing will be entirely satisfied. If Mid Sussex was to meet Brighton & Hove's housing needs based on travel to work data (Option 9 – 4,008 dwellings) or based on past migration data (2,200 under Option 10), a minor positive effect is expected. Although a large number of houses are still proposed in these options, more than half of Brighton & Hove's unmet housing need would still need to be provided elsewhere. For all options the impact would be more positive if a provision is made for the delivery of affordable housing. In addition, while in theory Option 8 would have a significant positive effect in terms of meeting a neighbouring authority's unmet housing needs, in practice this option would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet these housing numbers in full.

The effect expected on **SA objective 2** will depend on the specific sites chosen for development. Any of the options should have a minor positive effect on this SA objective as the broad locations where housing might be provided are around the existing urban areas of Hurstpierpoint, Burgess Hill and Haywards Heath which already provide nearby access to multiple health services, as well as leisure and open space facilities. The potential new market town development near Sayers Common however is not within proximity of existing health facilities. The overall effect is therefore noted as an uncertain minor positive; the effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities. However, significant additional development (more than 5,000 homes as proposed under Option 8) could have a significant negative effect on access to health facilities in the area due to the increased pressure on facilities.

Given that current access to schools varies between good (at Hurstpierpoint, Haywards Heath and Burgess Hill) to poor (at the potential new market town development near Sayers Common) then significant additional development (more than 5,000 homes as proposed under Option 8) at these locations could have a significant negative effect on access to schools (**SA objective 3**), due to an increase in population leading to an increase in pressure for school places. The pressure may be less under Option 9 and Option 10 hence a minor negative effect only is identified for this option. A minor positive effect is expected for all three options on the first part of the objective as development within the District at the potential development locations will be in close proximity to schools which already exist so some new residents would be likely to be catered for. The mixed effects on this objective would be more certain if it was known whether new development would result in any additional education facilities, for example through developer contributions.

The potential broad development locations for meeting Brighton & Hove's unmet need around Hurstpierpoint, Haywards Heath and Burgess Hill will provide good access to retail and community facilities as they are within existing urban areas. Dwellings provided at the potential new market town development near Sayers Common would not be in close proximity to an existing town centre or community facilities. Residents here would be likely to travel to nearby settlements to access such facilities although it should be noted that new facilities may be delivered as part of the potential new market town development near Sayers Common. Overall a minor positive is expected on **SA objective 4** irrespective of how much of Brighton & Hove's housing need is met in Mid Sussex.

The provision of large numbers of houses around the existing towns (as defined in the Mid Sussex District Plan 2014-2031 Consultation Draft) of Haywards Heath and Burgess Hill is expected to have a positive effect on **SA objective 5** given that a high demand for additional housing may exist from those who already live in the area. Provision of housing around these settlements would encourage local families who require housing not to leave the area leading to a promotion of cohesion within the community. Option 8, Option 9 and Option 10 also provide for housing around the village of Hurstpierpoint and for a new market town to the east of this near Sayers Common. Given the relatively low populations at these locations it is thought that the provision of high numbers of homes would be of detriment to community cohesion, as there would be a lower existing demand for housing and a negative effect could result on the character of these smaller settlements. It is expected that Option 8 which provides for a significant numbers of new homes (10,800) would have an equally significant positive and negative effect on this SA objective given that it provides for high numbers of houses around both larger towns and smaller villages. Option 9 and Option 10 provide for 4,008 and 2,200 houses respectively and as such both the positive and negative effect of allowing for such development at the potential development locations identified on community cohesion in the District are expected to be minor.

Environmental:

All of the potential development locations which might be used to meet Brighton & Hove's unmet housing needs include areas at high risk of flooding (Flood Zone 3). Therefore, the level of additional homes to be provided under any of the options could have a negative effect on **SA objective 6**. However, it is likely that specific development sites could be found around Hurstpierpoint, Haywards Heath, Burgess Hill and the potential new market town development near Sayers Common which are not in Flood Zone 3. Given the very high levels of additional housing proposed in Option 8 it may be difficult to find appropriate sites within the broad potential development locations which would not result in housing being placed in areas of high flood risk. As the specific development sites have not yet been selected an uncertain significant negative effect is expected on this SA objective for Option 8. As Option 9 and Option 10 propose lower numbers of housing overall, an uncertain minor negative effect is expected on reducing flood risk in Mid Sussex.

The potential development locations for Option 8, Option 9 and Option 10 could result in the loss of greenfield land either around existing settlements (Hurstpierpoint, Hayward Heath and Burgess Hill) or at the potential new market town near Sayers Common. The broad areas include mainly Grade 3 agricultural land or urbanised land. Land within the broad development location to the south west of Hurstpierpoint has been designated as Grade 2 agricultural land. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land during any development means that a significant negative effect is expected on **SA objective 7**. This would be most likely under Option 9, as the very high number of additional housing that would need to be provided in the District means that all of the broad locations, including south west of Hurstpierpoint would be more likely receive some additional development. As the area of Grade 2 agricultural land is quite small and development could be situated in other areas, Option 9 and Option 10, which propose lower levels of additional development are expected to have a minor negative effect on this objective. All effects are uncertain as they will depend where specific development proposals take place.

The broad locations for development of Brighton & Hove's unmet housing need are in areas which potentially may have a negative effect on **SA objective 8** either through development itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. There are a number of sites of nature conservation importance (SNCIs) within the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood

Complex and Meadows and Orchard Wood to the west; Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill; and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer would also acts as a constraint to the northern part of the area around Haywards Heath. The potential new market town near Sayers Common is in close proximity to a number of small pockets of ancient woodland (Laundry Wood, Collins Barn Shaw and Paddock Wood) which may constrain development given that there must be a 15m buffer been this biodiversity feature and new development. Overall, a significant negative effect is expected on **SA objective 8** for Option 8 given that the numbers of dwellings that would be delivered in this option are large, therefore, it may be difficult to avoid increased disturbance or damage to sensitive habitat locations within the broad locations identified. Option 9 and Option 10 with lower housing figures may be more able to avoid adverse effects on biodiversity and so a minor negative effect is identified. As any of the development might be able to be located within the potential development locations but away from noted sensitive biodiversity features a degree of uncertainty is attached to each of the effects for Options 8, Option 9 and Option 10.

Options 8, 9 and 10 are likely to have mixed effects on **SA objective 9**, as some of the broad potential development locations that could be used to meet Brighton & Hove's unmet need are directly adjacent to the nationally protected landscapes of The High Weald AONB (area surrounding Haywards Heath) and the South Downs National Park (areas surrounding Hurstpierpoint and Burgess Hill). Although none of the potential development locations are within the boundaries of any nationally protected landscapes, development at these locations may have a detrimental effect on the setting of these landscapes, and this is considered more likely to be significant under Option 8 given the high number of additional homes that would be provided. Option 9 and Option 10 which both provide for fewer than 5,000 additional homes in the District are expected to have minor negative effects on the setting of these protected landscapes. These locations would however provide easy access for residents to high quality green space and as such a minor positive effect is expected for all options as well. The potential new market town development near Sayers Common is not in close proximity to any nationally protected landscape areas but would provide new residents ease of access to the wider countryside given that it is not located within an excessively urbanised area. The effect on this SA objective would be more certain if the specific location of development was known.

The potential development location at Haywards Heath could potentially be constrained by and have impacts upon seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Similarly development at Burgess Hill has the potential to impact upon Silverdale Road/ Birchwood Grove Road, St John's and Fairfield conservation areas. Potential development around the Hurstpierpoint may be constrained by the conservation areas at Keymer, Hurst Wickham, Hurstpierpoint centre, and Langton Lane. The potential new market town near Sayers Common would be unaffected by heritage constraints in the Mid Sussex District, however, there are some listed buildings located in close proximity to the wider development location for the new market town within Horsham District). Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for all options. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design; and this is considered more likely to be significant under Option 8 due to the higher number of homes that would need to be delivered. Option 9 and Option 10 provide for fewer than 5,000 new homes in the District and as such the negative impact upon heritage assets in Mid Sussex is expected to be minor for these options. The effect on **SA objective 10** remains uncertain as the location and design of the development is unknown.

The provision of significant numbers of additional homes to meet Brighton & Hove's unmet housing needs may potentially result, at least in the short term, in increased levels of commuting between the two authorities as new Mid Sussex residents may still be employed in Brighton & Hove. High levels of commuting are already experienced between Brighton and Hove and Mid Sussex. As such there is a net flow of commuters from Brighton and Hove to Mid Sussex. Travel to work data from 2011 shows that 4,008 people commute to Mid Sussex from Brighton and Hove, compared to 3,492 who commute to Brighton and Hove from Mid Sussex (i.e. a net flow of 516 commuters in the direction of Mid Sussex). The provision of housing in Mid Sussex to meet Brighton & Hove's unmet needs has potential therefore to result in a small net decrease in the level of commuters between the authorities in the long term as those who commute to Mid Sussex from Brighton and Hove may take up the additional housing supplied in Mid Sussex. There are strong public transport (train) connections between the broad potential development locations surrounding Haywards Heath, Burgess Hill and Hurstpierpoint with each existing settlement having at least one train station. These connections also run directly south to Brighton and Hove. As such, positive effects could be expected on reducing car journeys and road congestion as journeys to Brighton & Hove from those who have relocated to Mid Sussex may be undertaken by public transport. The potential new market town near Sayers Common however is unlikely to have a good public transport infrastructure in the early stages of the development. Given the high number of homes that would be delivered under Option 8 significant negative effects on reducing road congestion are also expected, as it is unlikely that all journeys would be able to be made by public transport. Minor negative effects are expected for Option 9 and Option 10 given that less than 5,000 additional homes are provided for in these options. There is also one AQMA in the District located near to the broad potential development location around Hurstpierpoint at the crossroads of Hurst Road, Keymer Road, Brighton Road and London Road, Hassocks. Development at this location could therefore have a negative effect upon air pollution. A further negative effect of Option 8, Option 9 and Option 10 is noted on this SA objective as given that there is potential for increased commuting between these authorities at least temporarily, there is possibility for detrimental impacts on the South Downs National Park, as increased levels of car journeys would be required across this protected landscape. As such considering the strong internal existing links between the District's settlements as well as to Brighton and Hove, as well as the additional number of journeys that will result if these homes are provided a mixed effect are expected on **SA objective 11** for all options.

The location of additional housing should not have an effect on **SA objective 12** i.e. the level of waste produced, re-used or recycled by householders. However if the District was to accept all of Brighton & Hove's unmet housing needs as specified in Option 8 (10,800) it would most likely lead to an increase in the amount of waste the District as a whole would produce. As such, a significant negative effect is expected to result on this SA objective if Option 8 was implemented, with only a minor negative effect expected for Option 9 and Option 10 which proposed under 5,000 homes. The effect on this SA objective is uncertain as mitigating increasing levels of waste production may be possible through recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Water supply deficit is currently a recognised problem in the District as it and other authorities in the south east of England are classified by the Environment Agency as 'water-stressed'. There are also no new water resource options (e.g. groundwater sources, water transfer schemes, new reservoirs etc.) located within Mid Sussex. Burgess Hill is highlighted as an area with problems relating to waste water treatment capacity. If additional wastewater treatment capacity is required to accommodate growth to be provided in the District Plan, then this capacity can be planned, funded and delivered through the water industry's price review process. As such given the existing pressure that exists on the District's water supply and water quality it is recognised that higher increases in housing within the District as proposed in Option 8 would have a significant negative effect on **SA objective 13**. Option 9 and Option 10 which both provide for fewer than 5,000 new homes in the District are expected to have a minor negative effect on this SA objective.



**SA objective 14** which seeks to increase energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex is unlikely to be affected by the locations of additional housing. However, all three options would lead to higher levels of housing in the south of the District being developed and may result in an overall increase in demand on energy production, therefore a significant negative effect is expected for Options 8 (which proposes over 5,000 new homes in the District) and a minor negative effect is expected for Option 9 and Option 10.

*Economic:*

All three options include potential development areas around existing town centres (Hurstpierpoint, Haywards Heath and Burgess Hill) and to a varying degree will lead to the number of households within walking distance of a town centre (with the exception the potential new market town development near Sayers Common) being increased, therefore a positive effect is expected on **SA objective 15** as this could help to maintain town centre viability. This is expected to be significant for Options 8 which provides for over 5,000 new homes in the District and minor for Option 9 and Option 10.

All options will have a positive effect on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Hurstpierpoint, Haywards Heath and Burgess Hill) where existing employers are expected to be based. Only the potential new market town development near Sayers Common will not have immediate access to employment sites; although it is likely that new employment opportunities would be provided within the new settlement, in the short term, new residents would probably have to commute further afield for employment. This is expected to be significant for Options 8 which provides for over 5,000 new homes in the District, and minor for Option 9 and Option 10. It is recognised that the development of housing is an economic activity in this own right. It can provide opportunities for job creation and may increase the demand for services in the area. As such given the levels of housing provided for in Option 9 and Option 10 a minor positive effect is expected on **SA objective 17**. The provision of higher levels of housing specified in Option 8 may result in a longer term effect of increased competition for job opportunities for residents if additional employment land within Mid Sussex was not provided to complement the high levels of housing supplied. As such mixed effects are expected for Option 8.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Brighton & Hove's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

**Overall Conclusion:**

Despite making a significant contribution to meeting Brighton & Hove's unmet housing need, there could be a number of potentially significant negative effects on environmental receptors if Mid Sussex District were to deliver all of Brighton & Hove's unmet housing need (Option 8). Some of these effects might be able to be avoided or mitigated depending on the specific location of the additional dwellings required, however, the number of new homes to be delivered under this option would mean double the amount of homes would be developed than already planned for to meet Mid Sussex's own needs. In addition, this option could put additional pressure on places available at existing schools within Haywards Heath, Burgess Hill and Hurstpierpoint unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. Effects would be more minor under Option 9 and Option 10 (delivering around 34% and 19% of Brighton & Hove's unmet need respectively).



<b>Options: Crawley</b>																		
<b>11: Meet all Crawley's unmet need (4,173 homes)</b>																		
<b>12: Meet Crawley's unmet need based on travel to work data (2,651 homes)</b>																		
<b>13: Meet Crawley's unmet need based on Internal Migration data (1,240 homes)</b>																		
Broad potential locations for development: <ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• South of Crawley</li> <li>• Around East Grinstead</li> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Cuckfield</li> <li>• Around Bolney</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and Village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
11	++	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
12	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
13	+	+	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0

## Summary of Appraisal:

### Social:

All the options considered will provide additional housing to meet some or all of Crawley's unmet need and therefore have a positive effect on **SA Objective 1**. This effect will be significant for Option 11 as all of Crawley's unmet need would be met. Although Option 12 and Option 13 would provide a high level of additional housing, as 2,087 and 1,240 homes respectively would still be required in each scenario to fully satisfy Crawley's unmet housing need, a minor positive effect is expected on the SA objective. For all options the impact would be more positive if a provision is made for the delivery of affordable housing. However, in practice Option 11 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

Due to not knowing the exact locations where additional homes to meet Crawley's need would be provided, any effects on access of health, leisure and open spaces facilities are uncertain. Some of the broad locations on that could accommodate additional development for Crawley are located around existing settlements such as Crawley itself, Crawley Down, Copthorne, East Grinstead, Hurstpierpoint, Burgess Hill and Haywards Heath, which have good existing access to services, including health services (including hospitals in Crawley, East Grinstead and Haywards Heath) and open space facilities. Development at the potential new market town near Sayers Common is less likely to provide good access to these services in the early stages of the development; however this location would provide immediate access to the wider countryside. Housing development specified in Option 11, Option 12 and Option 13 may therefore have an uncertain minor positive effect on **SA Objective 2** given that the exact location of development is not known at this stage. The effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities.

As development to meet Options 11-13 would be most likely around existing settlements, including Crawley, there is likely to be a positive effect on access to existing schools. However, current access to schools varies between good (at Hurstpierpoint, Haywards Heath and Burgess Hill) to poor (at the potential new market town development near Sayers Common), and additional development around these locations could also have a negative effect, due to increase in population leading to an increase in pressure for school places, giving mixed effects on **SA objective 3**. The effects would be more certain if it was known if development would result in any additional education facilities being provided, for example through developer contributions.

The potential broad development locations for meeting Crawley's unmet housing needs around Copthorne, Cuckfield, East Grinstead, Haywards Heath, Hurstpierpoint, Burgess Hill, Bolney and Crawley Down will provide good access to retail and community facilities as they are within close proximity of existing urban areas. Similarly the potential development location to the east of Crawley is situated on the east edge of the settlement of Crawley providing relatively convenient access to retail and community facilities, although the potential development site to the south of Crawley is separated from existing development by the M23 and is approximately 600m from the urban edge. The potential new market town near Sayers Common will not initially provide access to existing retail and community facilities; however these facilities may be included with any development proposed. Overall a minor positive is expected on **SA objective 4** is expected for Option 11, Option 12 and Option 13 as although new retail or community facilities would not necessarily be provided, significant numbers of new homes would be built in close proximity to existing retail and community facilities.

Option 11, Option 12 and Option 13 provide for levels of housing several different potential development locations. Amongst these locations are those that Mid Sussex District Plan has identified as towns (Burgess Hill, Haywards Heath and East Grinstead), and villages (Hurstpierpoint, Cuckfield and Crawley Down). Settlements not identified as such are considered to be small villages or new locations for development. It is considered that the provision of housing at larger settlements such as towns will have a positive effect on community cohesion as a demand for additional housing may be present at these locations and as such the provision of housing in close proximity may result in families in the areas not be encouraged to leave the area. In contrast the provision of relatively high numbers of homes in areas surrounding smaller village is expected to be detrimental community cohesion, given that demand for homes will be unlikely to be present within the communities of said villages and that the development of high levels of housing at these locations may adversely affect character of these villages. All options provide for housing at a mix of locations ranging from larger towns, to smaller villages and new development locations. As such a minor positive and minor negative effect is expected on **SA objective 5** for Option 11, Option 12 and Option 13 considering the spread of housing provided.

Environmental:

Of the potential development locations identified to meet Crawley's unmet housing need in Mid Sussex, Hurstpierpoint, Burgess Hill, Haywards Heath and Cophorne as well as the potential new market town near Sayers Common have been identified as having areas of land within their boundaries which are at high risk of flooding (Flood Zone 3). Therefore, the level of additional homes to be provided under any of the options could have a negative effect on **SA objective 6**. However, it is likely that specific development sites could be found around the potential development locations which are not in Flood Zone 3. Therefore the effect on this SA objective is likely to be minor negative but uncertain for Options 11, Option 12 and Option 13.

Much of the land in the broad locations that could be used to meet Crawley's unmet need (around East Grinstead, Haywards Heath, Burgess Hill and Hurstpierpoint) has been classified as Grade 3 Agricultural Land and is therefore considered to be good quality land. Additionally land within the broad development location to the south west of Hurstpierpoint has been designated as Grade 2 agricultural land. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land during any development means that a negative effect is expected on **SA objective 7**. As the area Grade 2 of agricultural land is quite small and development might be situated in other areas (for example on Grade 4 agricultural land near Cophorne or non-agricultural land to the south of Crawley for example) where it would not affect the appropriate use of this land, the negative effect is recorded as uncertain.

The broad locations for development of Crawley's unmet housing need are in areas which potentially may have a negative effect on **SA objective 8** either through development itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. In the area south of the High Weald AONB (where 1,669, 835, or 496 houses respectively would be provided to meet Crawley's unmet housing need) there are a number of sites of nature conservation importance (SNCIs) within the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood Complex and Meadows and Orchard Wood to the west, Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill, and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer would also act as a constraint to the northern part of the area around Haywards Heath. The potential new market town near Sayers Common is in close proximity to a number of small pockets of ancient woodland (Laundry Wood, Collins Barn Shaw and Paddock Wood) which may constrain development given that there must be a 15m buffer between this

biodiversity feature and new development. To the north of the AONB development proceeding at the area east of Crawley, as well as at the potential development locations around Crawley Down, Copthorne and East Grinstead are expected to have a detrimental effect on Ashdown Forest SAC and SPA which are sensitive to air pollution (in particular acid deposition and eutrophication by nitrogen deposition)<sup>24</sup>. If the District was to accept some or even all of the Crawley's unmet housing need as specified by Option 11, Option 12 and option 13 (which would require 2,504, 1,252 or 744 homes to be built north of the AONB) an increased number of commuter journeys by car could result to these northerly potential development locations with new residents potentially still having jobs at Crawley's employment sites. Although journeys may not be directly through the Forest itself (the closest potential development location at East Grinstead is approximately 3km away and Crawley is to the north west of the District) given SAC and SPA sensitivity to air pollution this increase in vehicle use in the area is likely to be detrimental. A 7km zone of influence around Ashdown Forest has also been established given that the majority of visitors to the Forest travel from the nearby vicinity, due to the vulnerability of the qualifying bird species to disturbance by visitors, and as East Grinstead and Crawley Down are within this zone of influence negative effects are also expected. Considering that alternative sites may be found within the potential development locations the negative effect under each option is uncertain until specific locations are proposed.

There are likely to be mixed effects on **SA Objective 9**, as some of the broad locations for development are directly adjacent to the nationally protected landscapes of The High Weald AONB (areas surrounding Haywards Heath, East Grinstead, Crawley Down and Bolney) and the South Downs National Park (area surrounding Hurstpierpoint). Development may have an adverse effect on the setting of these landscapes. The broad location to the south of Crawley is within the High Weald AONB, and would therefore have a significant negative effect if it were to be developed, although this location could potentially be avoided. Minor positive effects could also occur through more households having good access to areas of open green space. Both types of effect are uncertain in the absence of specific locations for the development.

The potential development location at Haywards Heath could potentially be constrained by and have impacts upon seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Similarly, development at Burgess Hill has the potential to impact upon Silverdale Road/ Birchwood Grove Road, St John's and Fairfield conservation areas. Potential development around the Hurstpierpoint may be constrained by the conservation areas at Keymer, Hurst Wickham, Hurstpierpoint centre, and Langton Lane. The potential new market town near Sayers Common would be unaffected by heritage constraints in the Mid Sussex District, however, there are some listed buildings located in close proximity to the wider development location for the new market town within Horsham District. Cuckfield has two conservation areas which may be impacted upon by any development: the central Cuckfield and Whitemans Green conservation area to the north west. In East Grinstead development may be constrained by the East Grinstead conservation area and Estcots and East College Lane conservation area in the centre of the settlement. Any proposed development may be constrained by and impact upon by the Bolney conservation area in the village. Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for all options. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design. The mixed effect on **SA objective 10** remains uncertain as the location and design of the development is unknown.

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<sup>24</sup> Habitats Regulations Assessment for the Mid Sussex District Plan, May 2013, UE

Mixed effects are expected for **SA Objective 11**, as some of the broad locations are in areas where there is existing public transport provision which may result in a positive effect. Negative effects will occur where there is no existing public transport infrastructure as more households will use private cars for transportation. This may be the case in the potential new market town near Sayers Common and the development location to the south of Crawley (however it is noted that this development location is in close proximity to the existing settlement of Crawley) as there is unlikely to be good public transport infrastructure in the early stages of these developments. Increased levels of commuting between Crawley and Mid Sussex, in particular initially along the A23, may occur as new residents return to Crawley for employment opportunities. High levels of commuting already exist between the two authorities with a high net flow (4,468) experienced in the direction of Crawley and the provision of housing in Mid Sussex to meet the unmet demand of Crawley may increase the net flow to Crawley. Given that there are relatively strong rail connections between the two Districts (Crawley train station serves Haywards Heath and then Burgess Hill on the same railway line) there is potential to mitigate this increase in the number of commuter journeys made by car. It is noted however that although the majority of housing in Option 11, Option 12 and Option 13 is provided in the north of District which would reduce the length and potential negative effect of commuter car journeys, significant levels of housing (1,669, 1,060 and 496 respectively) are provided in the south of the District for these options, requiring length journey time for those returning to Crawley for employment. Negative impacts may occur in the District due to increased levels of traffic around the Hassocks AQMA if there was more development in the broad location around Hurstpierpoint which would be detrimental to air quality in the surrounding area.

Given the existing pressure that exists on the District's water supply and water quality it is considered that increases in housing within the District under Options 11, 12 and 13) could have a negative effect on **SA objective 13**. The District is already identified as 'water-stressed' with regard to water supply. Burgess Hill has been highlighted as an area with problems relating to waste water treatment capacity. Goddards Green Wastewater Treatment Works (Burgess Hill area) has issues with environmental capacity above and beyond District Plan housing requirement for this area (i.e. Burgess Hill Strategic Sites and Neighbourhood Plan scale development) although does have physical capacity. Currently the majority of waterbodies in the District are failing to meet the Good Status Water Framework Directive objective and existing sewerage infrastructure within the District is operating at or near capacity posing a potential risk to water quality. Crawley waste water treatment facility has been identified for an upgrade in its capacity however this increase in capacity would be to serve strategic developments at Crawley – the Environment Agency and Thames Water have previously identified issues of any more strategic sites coming forward in this location until post 2021, meaning that water quality issues are likely to remain as a constraint to development in proximity to Crawley.

With regards to **SA Objective 12 and 14**, the location of housing will not impact upon waste production, recycling and energy usage. However, more housing would result in increased waste production and demand for energy, which would require management and may lead to a minor negative effect for the increased levels of housing proposed in Option 11, Option 12 and Option 13. These effects are uncertain as they could be mitigated by resident behaviour with regards to waste production and recycling and energy conservation.

#### Economic:

As all three options include potential development areas around existing town centres and to a varying degree will lead to the number of households within walking distance of a town or village centre (with the exception the potential new market town development near Sayers Common and the potential development location to the south of Crawley) being increased, a minor positive effect is expected on **SA objective 15** for all options.



Option 11, Option 12 and Option 13 will have a minor positive effect on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Crawley Down, Copthorne, East Grinstead, Cuckfield, Bolney, Burgess Hill, Hayward Heath and the area east of Crawley) where existing employers are based. While not leading to the immediate creation of new jobs in these areas, this will help to provide new residents easy access to existing employment opportunities.

The development of housing is accepted as an economic activity in its own right. It creates the potential for job provision and additionally may generate demand for services. At the levels of housing provided for in Option 11, Option 12 and Option 13 it is not expected that a lack of provision of additional employment land within the District should negatively affect sustainable economic growth in the District. As such a minor positive effect is expected on **SA objective 17**.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Crawley's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

**Overall Conclusion:**

There could be a number of potentially negative effects particularly on environmental receptors if Mid Sussex District were to deliver all, just over half or 30% of Crawley's unmet housing need. However, a number of these effects could be avoided depending on the specific location of the additional dwellings required. In addition, there could be pressure placed on existing schools within Crawley, East Grinstead, Haywards Heath, Burgess Hill and Hurstpierpoint unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. The effects of all three options are generally considered to be similar in scale, as the difference in the number of additional homes to be delivered under the three options is not as large as between some of the other authorities' individual options (between ~1,200 to 4,200 additional homes). The key difference is the significant positive effect that Option 11 would have on SA objective 1 (provision of housing) as it would meet the full unmet housing need for Crawley.

Options: Lewes																		
14: Meet all Lewes's unmet need (4,200 homes)																		
15: Meet Lewes' unmet need based on travel to work data (2,131 homes)																		
16: Meet Lewes's unmet need based on Internal Migration data (-380 homes: no contribution to unmet need)																		
Broad potential locations for development: <ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Cuckfield</li> <li>• Around Bolney</li> <li>• Around Hurstpierpoint/Hassocks</li> </ul>																		
Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
14	++	+?	+/-?	+	+/-	-?	-?	-?	+/-	+/-?	+/-	-?	-	-?	+	+	+	0
15	+	+?	+/-?	+	+/-	-?	-?	-?	+/-	+/-?	+/-	-?	-	-?	+	+	+	0
16	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Summary of Appraisal:

### Social

Options 14 and 15 will both have a positive effect on **SA Objective 1**. This effect will be significant for Option 14 as this would involve Mid Sussex meeting all of Lewes District's housing need and providing a high number of homes (4,200). If Mid Sussex was to around half of Lewes's housing need (Option 15) a minor positive effect is expected, since although a large number of homes are still proposed under this option (2,131) there will still be unmet housing need for Lewes District. For Options 14 and 15 the effect would be more positive if a provision is made for the delivery of affordable housing. Option 16 is expected to have a minor negative effect as it would not make any contribution to meeting Lewes's unmet housing need.

The expected effect on **SA Objective 2** will depend on the specific sites chosen for development. The broad locations that could accommodate additional development for Lewes around Bolney, Hurstpierpoint, Burgess Hill and Haywards Heath are areas which have good existing access to services, including GPs surgeries and leisure and open space services. Hospital services are currently provided at Haywards Heath. The District is connected to the Sustrans National Cycling Route which runs from north to south from Crawley, through Bolney and Hurstpierpoint connecting numerous open spaces along the way. Overall the effect for Options 14 and 15 is expected to be uncertain minor positive; the effects would be more positive if plans included additions or improvements to existing health services and facilities. A negligible effect is expected on this SA objective for Option 16 as no additional housing will be provided.

There are established educational facilities within the broad areas at Haywards Heath, Burgess Hill and Hurstpierpoint which could be utilised by the residents of new households in these areas. However, varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in Hurstpierpoint, Haywards Heath and Burgess Hill<sup>25</sup>. Additional development (of the scale presented under Options 14 and 15) may lead to increased pressure for school places. A minor positive effect on **SA Objective 3** is expected for Options 14 and 15 on the first part of the objective, as development within the District at the potential development sites will be in close proximity to schools which already exist. However, considering the increase in pressure on access to schools in the area (many of which are already close to capacity) that would result from Option 14 and Option 15 a significant negative effect could result. Overall, uncertain mixed effects are predicted for these options as it is unknown if provisions will be made for the inclusion of any additional education facilities with any proposed development, for example through developer contributions. A negligible effect is predicted for Option 16 as no new homes would be provided.

A minor positive effect is expected for both Options 14 and 15 for **SA Objective 4**, as all of the broad locations (Bolney, Haywards Heath, Hurstpierpoint and Burgess Hill) are in proximity to existing urban centres with good access to retail and community facilities. Although these options will not result in an increase in the provision of these facilities they will result in more residents being within reasonable walking distance of retail or community services. Uncertainty is attached to this minor positive effect as the specific locations of the sites development sites are unknown at this stage. A negligible effect is predicted for Option 16 as no new homes will be provided.

Option 14 and Option 15 will provide for housing at and around Bolney, Hurstpierpoint, Burgess Hill and Haywards Heath. Haywards Heath and Burgess Hill have been identified as towns and Hurstpierpoint as a village in the Mid Sussex District Plan 2014-2031 Consultation Draft. The provision of housing around the existing towns is expected to have a positive effect on **SA objective 5** given that a high demand for addition housing from those who already live in the area

<sup>25</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

may already exist. Provision of housing around these settlements would encourage local families not to leave the area lead to a promotion of cohesion in the community. Housing provided around the village of Hurstpierpoint and small village of Bolney is expected to have a negative effect on this SA objective. The provision of homes around villages of lesser population could be of detriment to community cohesion, as there would be a lesser demand for housing here and additionally a negative effect would result on the character of these smaller settlements. Option 14 and Option 15 provides for 4,200 houses and 2,131 houses respectively and as such both the positive and negative effect are expected to be minor. A negligible effect is expected for Option 16 as it would not result in an increase in housing in the District.

Environmental:

Around Haywards Heath and Burgess Hill there are areas that are classified as flood risk 2 or 3 (high risk) by the Environment Agency. Housing development in these areas could have a negative effect on **SA Objective 6**, although it is likely that specific development locations could be found within the broad areas around Haywards Heath and Burgess Hill that are not within these flood risk zones. Therefore, the effect on this objective for Options 14 and 15 is likely to be minor negative, although this is not certain. As no new additional housing is proposed in Option 16 a negligible effect is expected.

Most of the land surrounding Haywards Heath, Burgess Hill and Hurstpierpoint is classified as Agricultural Grade 3, and is therefore considered to be good quality land. There are also small areas of Grade 2 land located in the broad areas surrounding Hurstpierpoint. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land during any development means that a negative effect is expected on **SA objective 7** as Option 14 and Option 15 propose high levels of housing. The effects are uncertain in the absence of specific development locations as developers may utilise previously developed land or lower quality agricultural land for housing development. Option 16 would have a negligible effect on this SA objective as no new housing would be provided in the District.

There are numerous sites surrounding Haywards Heath, Burgess Hill and Hurstpierpoint which are nationally and locally designated for their importance to the conservation of biodiversity. These are mainly found north of Burgess Hill and to the west and north of Haywards Heath. In the area south of the High Weald AONB (where 4,200 and 2,131 houses respectively would be provided to meet Lewes's unmet housing need) there are a number of sites of nature conservation importance (SNCIs) within the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood Complex and Meadows and Orchard Wood to the west, Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill, and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer would also act as a constraint to the northern part of the area around Haywards Heath. The Ditchling Common SSSI on the edge of Hayward Heath (actually within Lewes District boundary) may also be affected by increased traffic levels running through the SSSI as a result of greater levels of commuting between the two districts. Development around the village of Bolney may negatively impact upon pockets of ancient woodland which are found to the north, south, east and west of the settlement. The amount of housing provided for in Option 14 and Option 15 could have a minor negative impact on the biodiversity at these sites through habitat loss or increased levels of disturbance. These negative effects for **SA Objective 8** are uncertain in the absence of specific development locations. Option 16 would have a negligible effect on this SA objective as it would not result in further housing being provided in the District.

With regards to **SA Objective 9**, the strategic location around Haywards Heath abuts the High Weald AONB to the north, while the location around Hurstpierpoint is adjacent to the South Downs National Park. High levels of housing development could have a negative effect on the setting of these nationally protected landscapes. However, there may also be positive impacts for this

make these areas and the high quality open space available at them more accessible to residents. A mixed effect is expected for this objective for Option 14 and Option 15. The effect on this SA objective would be more certain if the specific location of development was known. As Option 16 does not require any further development in the District a negligible effect is expected.

There are also expected to be mixed, uncertain effects on **SA Objective 10**: Protection of the historic environment. There are numerous heritage features within the strategic locations that could accommodate the existing development required by Lewes, including Conservation Areas (including there are seven in Haywards Heath, three in Burgess Hill, four in Hurstpierpoint and one in Bolney) and Listed Buildings (including the Grade II\* Wickham Farmhouse and Suntre House in Haywards Heath). The effect of new housing development on these features is unknown without specific design plans, however there is potential for new development to enhance or detract from the setting of these heritage features. Therefore mixed effects are expected for Option 14 and Option 15. A negligible effect is expected for Option 16 as it will require no further provision of housing in the District.

The strategic locations identified to accommodate additional housing need for Lewes have good existing levels of public transport infrastructure including bus and rail links. For example, good rail and bus links exist between Burgess Hill and Haywards Heath. It may be expected that an increase in commuting by car would occur between the District of Lewes and Mid Sussex if provision was made to meet additional housing need in Mid Sussex as new residents still may still have employment in Lewes. It should be considered however that travel to work data from 2011 showed that there was a net flow of commuters in the direction of Mid Sussex from Lewes, with 2,131 workers travelling to Mid Sussex from Lewes and 1,803 workers travelling from Mid Sussex to Lewes. The provision of housing in Mid Sussex to satisfy Lewes's unmet housing need may result in a small number of workers taking up this housing in Mid Sussex which might result in a small decrease in commuting numbers between the Districts. Public transport links between Lewes and Mid Sussex are not as strong as the links on the Brighton-London line however, with only one direct rail link running from Haywards Heath to Lewes town and Newhaven in Lewes District. Additional development in the broad location around Hurstpierpoint may compound existing air quality problems at the AQMA near Hassocks due to additional traffic. As a result, mixed effects on **SA Objective 11** are expected for Option 14 and Option 15 considering levels of commuting between the Districts, Mid Sussex's relatively strong internal public transport links and the relatively poor public transport links between Lewes and Mid Sussex. Option 16 is expected to have a negligible effect as no new development is provided for.

With regards to **SA Objective 12**, the location of housing will not impact upon waste production, recycling and energy usage. However, more housing would result in increased waste production which would require management and may lead to a minor negative effect for greater amounts of housing such as those proposed in Options 14 and 15 (4,200 and 2,131 homes). These effects are uncertain as they could be mitigated by resident behaviour and available facilities with regards to waste production and recycling. A negligible effect is expected for Option 16 which will result in no further housing being provided in the District.

Greater numbers of homes in Mid Sussex are likely to put further pressure on areas which are already identified as 'water-stressed'<sup>26</sup> with regard water supply and wastewater treatment. Adding to this existing pressure by constructing more homes may result in a negative effect on **SA Objective 13**. A negligible effect is expected for Option 16 which will result in no further housing being provided in the District.

**SA objective 14**, which seeks to increase energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex is unlikely to be

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<sup>26</sup> Mid Sussex Capacity Study. June 2014. LUC



affected by accepting more or less of Lewes's unmet housing need. However, proceeding with Option 14 or 15 which will lead to higher levels of housing in the south of the District (4,200 and 2,100 dwellings respectively) may result in an overall increase in demand on energy production; therefore a minor negative effect is expected for these options. As Option 16 will not provide any further housing in the District a negligible effect is expected on this SA objective.

*Economic:*

The strategic locations identified that could accommodate the additional housing development need for Lewes are all identified around existing settlements (Bolney, Hurstpierpoint, Haywards Heath and Burgess Hill), and have good existing links with Town Centres. Although this would not directly provide more floorspace for "Town Centre Uses" these options would result in more households being provided within walking distance of a town centre, which would result in a minor positive effect for **SA Objective 15** for Options 14 and 15. Option 16 would have a negligible effect on this SA objective as it would not result in any further housing being required in the District.

The close proximity of the broad locations at Bolney, Hurstpierpoint, Haywards Heath and Burgess Hill to existing employment areas in urban centres will lead a minor positive effect on **SA Objective 16** for Options 14 and 15, as there will be existing employment opportunities nearby which will be accessible to new residents. As Option 16 will not result in the creation of any additional homes in Mid Sussex a negligible effect is expected.

The development of housing is accepted as being an economic activity in its own right. It creates the potential for job provision and additionally may generate demand for services. At the levels of housing provided for in Option 14 and Option 15 it is not expected that a lack of provision of additional employment land within the District should negatively affect sustainable economic growth in the District. As such a minor positive effect is expected on **SA objective 17** for these options. Option 16 does not provide for more homes in the District and therefore the effect on this SA objective is considered to be negligible.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Lewes District's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

**Overall Conclusion:**

Options 14 and 15 would have mainly minor sustainability effects as despite providing for either all or half of Lewes's unmet housing requirements, the amount of additional housing under both options is lower than 5,000. Option 16 would not contribute to any of Lewes's unmet housing need, and therefore would have negligible effects on all SA objectives except for a minor negative effect on SA objective 1, due to the lack of provision of any housing. Conversely, Option 14 (meeting all of Lewes's unmet need) would have a significant positive effect on SA objective 1. There could be a number of potentially negative effects particularly on environmental receptors if Mid Sussex District were to deliver all or half of Lewes's unmet housing need. However, a number of these effects could be minimised depending on the specific location of the additional dwellings required. In addition, there could be pressure placed on existing schools within Haywards Heath, Burgess Hill and Hurstpierpoint unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements.

Options: Tandridge																		
17: Meet all Tandridge's unmet need (6,580 homes)																		
18: Meet 50% of Tandridge's unmet need (3,290 homes)																		
19: Meet Tandridge's unmet need based on Internal Migration data (650 homes)																		
Broad potential locations for development: <ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• Around East Grinstead</li> </ul>																		
Policy Option	Social					Environmental										Economic		
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
17	++	+?	+/--?	+	++/--	--?	-?	--?	+/--?	+/-?	+/--	--?	--	--	++	++	+/-	0
18	+	+?	+/--?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0
19	+	+?	+/--?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-	+	+	+	0

## Summary of Appraisal:

### Social:

All the options considered will provide additional housing and therefore have a positive effect on **SA Objective 1**. This effect will be significant for Option 17 as the full unmet need for Tandridge will be provided. A minor positive effect is expected for Option 18 and Option 19 as although high levels of additional housing is provided, a large amount of Tandridge's housing need will remain unmet. For all options the impact would be more positive if a provision is made for the delivery of affordable housing. In practice, Option 17 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

The effect expected on **SA objective 2** will depend on the specific sites chosen for development (within the broad locations north of the High Weald AONB). Any of the options should have a minor positive effect on this SA objective as the broad locations where housing might be provided are around the existing urban areas of East Grinstead, Copthorne, Crawley Down and the area to the east of Crawley which already provide nearby access to multiple health services, as well as leisure and open space facilities. The overall effect is therefore noted as an uncertain minor positive; the effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities. The effect is noted as uncertain as the exact location of development is unknown at this stage.

All the main settlements and a large number of villages have a school in the District within walking distance, with 27 primary and seven secondary schools serving the District. Varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in East Grinstead<sup>27</sup>. As such given that current access to schools is mainly good (at Crawley Down, east of Crawley and Copthorne) and considering that pressure already exists for school places in the area major development (options 17 and 18) around these settlements could have a negative effect on access to schools, due to increases in population leading to an increase in pressure for school places. Option 17 which would make provision for 6,580 additional dwellings in Mid Sussex could have a significant negative effect on pressure for school places in the District. However, mixed effects are predicted on **SA objective 3**, as there should be some provisions within existing schools for new residents in the short term. The effects would be more certain if it was known if development would result in any additional education facilities being provided, for example through developer contributions.

The potential broad development locations for meeting Tandridge's unmet housing needs around Copthorne, East Grinstead, and Crawley Down will provide good access to retail and community facilities as they are within close proximity of existing urban areas. Similarly the potential development location to the east of Crawley is situated on the eastern edge of the settlement of Crawley. Overall a minor positive is expected on **SA objective 4** is expected for Option 17, Option 18 and Option 19 as although new retail or community facilities would not necessarily be provided, significant numbers of new homes would be built in close proximity to existing retail and community facilities.

Option 17, Option 18 and Option 19 for the most part provide for housing around settlements which have been identified as villages or towns. In the Mid Sussex District Plan 2014-2031 Consultation Draft East Grinstead has been identified as a town while Crawley Down is identified as a village. Provision of housing around a larger settlement such as a town is expected to have a positive effect on allowing for an increase in community cohesion given that high demand for additional

<sup>27</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

housing from those who already live in the area may exist. Provision of housing around a larger settlement would encourage local families not to leave the area leading to a promotion of cohesion in the community. In contrast the over provision of housing around small villages may have a negative effect on community cohesion given that it is likely that there would be a lesser demand for housing at these locations and additionally a negative effect might result on the character of these smaller settlements. Option 17 provides for high levels of housing (6,580 homes) around East Grinstead (a town), Crawley Down (a village) as well as Copthorne (a small village) and to the east of Crawley. Given that high numbers of homes are provided at locations identified as both towns and villages significant positive and negative effects (and an overall mixed effect) have been identified on **SA objective 5** for this option. As Option 18 and Option 19 provide for a reduced number of homes they are expected to have minor positive and negative effects on community cohesion in the District.

#### Environmental:

Of the potential development locations that might be used for meeting Tandridge's unmet need, Copthorne has areas around it identified as having a high risk of flooding (Flood Zone 3). Land to the east of Crawley has been identified as having a medium risk of flooding (Flood Zone 2). Therefore, the level of additional homes to be provided under Option 17, Option 18 and Option 19 could have a negative effect on **SA objective 6**. However, it is likely that specific development sites could be found around Crawley Down, East Grinstead, Copthorne and the area east of Crawley which are not in Flood Zone 2 or Flood Zone 3. Therefore the effect on this SA objective is likely to be minor negative but uncertain for Option 18 and Option 19, but significant for Option 17 due to the larger number of homes that would need to be located within the broad development locations.

The potential development locations considered will mainly result in the loss of greenfield land either around existing settlements (Crawley Down, East Grinstead, Copthorne and the area to the east of Crawley). Many of the broad areas include large amounts of Grade 3 agricultural land (around East Grinstead, Crawley Down, and the area east of Crawley) or mainly urbanised land. The potential development area identified at Copthorne has been designated as Grade 4 agricultural land. Given that development may result in the loss of land which is designated as Grade 3 agricultural land, the potential loss of this good quality agricultural land during any development means that a minor negative effect is expected on **SA objective 7** for Options 17, Option 18 and Option 19. As there is potential to locate development on land of lesser agricultural value (Grade 4 agricultural land at Copthorne for example) the minor negative effect of these options is recorded as uncertain.

The broad locations for development are in areas which potentially may have a negative effect on **SA objective 8** either through development of Tandridge's unmet housing need itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. The potential development sites for Option 17, Option 18 and option 19 are concentrated to the north of the District and additional housing development at the area east of Crawley, as well as at the potential development locations around Crawley Down, Copthorne and East Grinstead could have a detrimental effect on Ashdown Forest SAC and SPA which are sensitive to air pollution (in particular acid deposition and eutrophication by nitrogen deposition)<sup>28</sup>. If the District was to accept some or even all of Tandridge's unmet housing need as specified by Option 17, Option 18 and option 19 (which would require 6,580, 3,290 or 650 homes to be built north of the AONB) an increased number of commuter journeys by car could result to these northerly potential development locations with new residents potentially still having jobs at Tandridge's employment sites. Although increased numbers of journeys may not be directly through the Forest itself (the closest potential development location at East Grinstead is approximately 3km away and Tandridge is directly to the north of the District), given SAC and SPA sensitivity to air pollution this

<sup>28</sup> Habitats Regulations Assessment for the Mid Sussex District Plan, May 2013, UE

increase in vehicle use in the area is likely to be detrimental. A 7km zone of influence around Ashdown Forest has also been established given that the majority of visitors to the Forest travel from the nearby vicinity. Bird species are vulnerable to disturbance by visitors, and as East Grinstead and Crawley Down are within this zone of influence a significant negative effect is expected on this SA objective. If Option 17 is chosen, the effects on biodiversity could be significant due to the larger number of homes that would need to be delivered in the north of the District, although alternative sites may be found within the potential development locations, therefore the significant negative effect is uncertain. As Options 18 and 19 propose a lower number of homes which might be more easily accommodated without impacting upon the Forest, a minor uncertain negative effect is expected.

Option 17, Option 18 and Option 19 are likely to have a mixed effect on **SA objective 9**, as some of the broad potential development locations that could be used to meet Tandridge's unmet need are directly adjacent to the nationally protected landscapes of The High Weald AONB (the areas east of Crawley, East Grinstead and Crawley Down). Additional development at these locations which border the AONB may have a detrimental effect on the setting of these landscapes, and this could be significant under Option 17 due to the higher number of homes to be provided. These locations would however provide easy access for residents to high quality green space, and therefore a minor positive effect is also expected for Options 17, 18 19. The effect on this SA objective would be more certain if the specific location of development was known.

The development is proposed for the northern part of Mid Sussex where many potential development locations are not constrained by conservation areas, scheduled monuments or registered parks and gardens. However, development around East Grinstead may be constrained by the East Grinstead conservation area and Estcots and East College Lane conservation area in the centre of the settlement and additionally the registered parks and gardens of Standen and Brockhurst to the east. Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for Options 17, 18 19, with a potential significant negative effect from Option 17 due to the higher number of homes proposed. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design. The effect on **SA objective 10** remains uncertain as the location and design of the development is unknown.

Options 17, 18 19 could lead to increased levels of commuting between the Districts of Tandridge and Mid Sussex as new residents may still be employed in Tandridge. Travel to work data shows that more people travel from Mid Sussex to Tandridge for work (1,834), than travel from Tandridge to Mid Sussex for work (940) which suggests that meeting Tandridge's unmet housing need in Mid Sussex would not result in a reduction in the level of commuting between the Districts. The need for new housing to meet Tandridge's needs is primarily in the north of Tandridge with close access to London. Therefore, providing housing in Mid Sussex to meet Tandridge's needs might encourage longer commuting patterns (e.g. to London by train) or commuting by road to employment sites in Tandridge to continue employment at these locations. Only one of the potential development areas (East Grinstead) provides access to rail travel. However, these connections run north to the Tandridge settlements of Lingfield and Oxted before progressing to London. Although relatively strong rail connections run from East Grinstead to Tandridge, these connections are limited to only one of the potential development sites. Additionally although the other potential development locations have been identified in close proximity to existing urban areas suggesting reduced journeys may be needed for employment, the public transport connections are less strong between the broad development locations (there is no direct train service between East Grinstead and Crawley, although bus services are in operation) and so a mixed overall effect is expected on **SA objective 11** for Option 17, Option 18 and Option. 19. Considering the higher levels of housing provided in Option 19 and the relatively weak public



transport connections between the two Districts in relationship to the positive effect of providing housing around existing settlements it is expected that this option would have a significant negative effect on this SA objective within its overall mixed effect, compared to the minor negative effect which would result from providing the reduced numbers of houses in Option 17 and Option 18.

The location of additional housing should not have an effect on **SA objective 12**, i.e. the level of waste produced, re-used or recycled per householder. However if the District was to accept a significant amount of Tandridge's unmet housing needs as specified in Option 17 it would most likely lead to an increase in the amount of waste the District as a whole would produce. As such a significant negative effect is expected to result on this SA objective if Option 17 is implemented, with a minor negative effect under Option 18 or 19. The effect on this SA objective is uncertain as mitigating increasing levels of waste production may be possible through improved recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Given the overall existing pressure on the Districts water supply and water quality it is recognised that high increases in housing within the District (as proposed under Option 17) could have a significant negative effect on **SA objective 13**. Options 18 and 19 will result in lower amounts of additional housing being provided in Mid Sussex to meet Tandridge's needs and therefore a minor negative effect is expected on this SA objective.

**SA objective 14** of increasing energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex will not be affected by accepting more or less of Tandridge's unmet housing need. Proceeding with Option 17, 18 or 19 which will lead to higher levels of housing being provided in mid Sussex may result in an overall increase in demand on energy production however and therefore a negative effect is expected on this SA objective, with Option 17 having a significant effect due to the higher number of homes proposed.

#### Economic:

As all three options include potential development areas around existing town centres (Crawley Down, Copthorne, East Grinstead, and the area east of Crawley) and to a varying degree will lead to the number of households within walking distance of a town centre being increased, a positive effect is expected on **SA objective 15**, and this would be significant for Option 17 due to the higher number of homes proposed.

The options will have a positive effect on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Crawley Down, Copthorne, East Grinstead, and the area east of Crawley) where existing employers are based. While not leading to the immediate creation of new jobs in these areas, this will help to provide new residents easy access to existing employment opportunities, and is likely to be significant for Option 17.

Option 17 provides for a high level of housing in the District (6,580). Although housing development is an economic activity which has potential to create job opportunities and increase the demand for services in the District it is also expected that without the provision of additional employment land within the District a negative effect on sustainable economic growth will result given that businesses required to provide job opportunities to new residents will not have the space to expand. As the number of houses provided for in Option 18 and Option 19 are reduced in comparison a minor positive effect is expected on **SA objective 17** as it is thought that providing this level of housing will not put pressure on the demand for employment in the District.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Tandridge's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

**Overall Conclusion:**

Despite making a significant contribution to meeting Tandridge's unmet housing need, there could be a number of potentially significant negative effects on environmental receptors if Mid Sussex District were to deliver all of Tandridge's unmet housing need (Option 17). Some of these effects might be able to be avoided or mitigated depending on the specific location of the additional dwellings required, however, the number of new homes to be delivered would mean over 50% more homes would be developed than already planned for to meet Mid Sussex's own needs (i.e. 6,580 on top of the 10,600 in the Submission District Plan). In addition, Option 17 could put pressure placed on existing schools within East Grinstead, Crawley Down and Copthorne unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. Effects would be similar but more minor under Options 18 and 19.

Options: Wealden																		
20. Meet all Wealden's unmet need (3,320 houses)																		
21. Meet Wealden's unmet need based on travel to work data (2,375 houses)																		
22. Meet Wealden's unmet need based on Internal Migration data (-931 houses: no contribution to unmet need)																		
Broad potential locations for development:																		
<ul style="list-style-type: none"> <li>• Around Copthorne</li> <li>• Around Crawley Down</li> <li>• East of Crawley</li> <li>• South of Crawley</li> <li>• Around East Grinstead</li> <li>• Around Haywards Heath</li> <li>• Around Cuckfield</li> </ul>																		
Policy Option	Social					Environmental								Economic				
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism
20	++	+	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-?	+	+	+	0
21	+	+	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-?	+	+	+	0
22	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Summary of Appraisal:

### Social:

Development proposals which would provide additional housing in the District to meet Wealden District's needs are expected to have a positive effect on **SA objective 1**. If Mid Sussex District meets all of Wealden District's housing needs (option 20) a significant positive effect is expected on this SA objective given the high number of houses specified (3,320) and considering that the shortfall in housing will be entirely satisfied. If Mid Sussex was to meet 50% of Wealden District's housing needs (option 21 – 1,660 dwellings) a minor positive effect is expected. Although a large number of houses are proposed in this option, half of Wealden's housing need remains unmet. Option 22, which is based on past migration patterns would not contribute to any of Wealden's unmet need, and is therefore considered to have a minor negative effect on this SA objective. For all options the effect would be more positive if a provision is made for the delivery of affordable housing.

The effect expected on **SA objective 2** will depend on the specific sites chosen for development. The options which should lead to the provision of more houses will have a minor positive effect on this SA objective as the broad locations where housing might be provided are around the existing urban areas of East Grinstead, Crawley Down, Copthorne, Cuckfield, Haywards Heath and east of Crawley, which already provide nearby access to multiple health services, as well as leisure and open space facilities. The potential development location to the south of Crawley however is not within proximity of existing health facilities. The overall effect for Options 20 and 21 is therefore noted as an uncertain minor positive; the effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities. As Option 22 would not result in any new housing being provided a negligible effect is expected.

All the main settlements and a large number of villages have a school in the District within walking distance, with 27 primary and seven secondary schools serving the District. Varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in East Grinstead and Haywards Heath<sup>29</sup>. The potential development location to the south of Crawley would currently provide no nearby education facilities. As such given that current access to schools varies between good (at Haywards Heath, Cuckfield, Crawley Down, east of Crawley and Copthorne) to poor (at the potential town development location south of Crawley) then development under Options 20 and 21 at these sites could have a minor positive effect in terms of access to existing schools (**SA objective 3**) in the short term, but also a negative effect due to increases in population leading to an increase in pressure for school places. Option 22 which would not lead to any additional development in Mid Sussex is considered to have a negligible effect on pressure for school places in the District. The effect would be more certain if it was known if development would result in any additional education facilities being provided, for example through developer contributions.

The potential broad development locations for meeting Wealden's unmet housing needs around Copthorne, East Grinstead, Cuckfield, Crawley Down and Haywards Heath will provide good access to retail and community facilities as they are within existing urban areas. Similarly the potential development location to the east of Crawley is situated on the eastern edge of the settlement of Crawley. Dwellings provided at the potential development location to the south of Crawley would not be in close proximity to an existing town centre or community facilities as the area is beyond the settlement edge and is separated from Crawley by the M23 to the north west. Residents here would be likely to travel to Crawley and other settlements to access such facilities although it should be noted that new facilities may be delivered as part of the potential development to the south of Crawley. Overall a minor positive is expected on **SA objective 4** is

<sup>29</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC

expected from Options 20 and 21 which would provide additional homes in close proximity to retail and community facilities. Option 22 would have a negligible effect on this SA objective as it would not provide any additional houses in the Mid Sussex District.

The Mid Sussex District Plan 2014-2031 Consultation Draft has identified the settlements of Haywards Heath and East Grinstead as towns. Crawley Down has been identified as a village and all settlements below this are recognised as small villages. The provision of additional housing around a town is likely to have a positive effect on community cohesion given that a high demand for addition housing from those who already live in the area may exist. Provision of housing around settlements of this size would encourage local families not to leave the area leading to a promotion of cohesion in the community. In contrast, given the relatively low populations at village and small village locations it is thought that the provision of high numbers of homes would be of detriment to community cohesion, as there would be a lesser demand for housing here and additionally a negative effect would result on the character of these smaller settlements. Option 20 and Option 21 provide for housing around towns, villages and small villages and as such both positive and negative effects are expected on **SA objective 5**. As Option 22 would not result in the provision of additional housing a negligible effect is expected on community cohesion.

Environmental:

Of the potential development locations for Wealden's unmet need, Copthorne, Haywards Heath, Cuckfield, and the area south of Crawley have areas of land which has been identified as having a high risk of flooding (Flood Zone 3). Land within the potential development area to the east of Crawley has been identified as having a medium risk of flooding (Flood Zone 2). Therefore, Options 20 and 21 could have a negative effect on **SA objective 6**. However it is likely that specific development sites could be found around Haywards Heath, Cuckfield, Crawley Down, East Grinstead, Copthorne and areas east and south of Crawley which are not in Flood Zone 2 or Flood Zone 3. Therefore the effect on this SA objective is likely to be minor negative but uncertain. As no additional housing would be provided in the Mid Sussex District if Option 22 was chosen a negligible effect is expected on this SA objective.

The potential development locations considered will mainly result in the loss of greenfield land either around existing settlements (Haywards Heath, Cuckfield, Crawley Down, East Grinstead, Copthorne and the area to the east of Crawley) or at the potential development location to the south of Crawley. Many of the broad areas include mainly Grade 3 agricultural land (around Haywards Heath, Cuckfield, East Grinstead, Crawley Down, and the area east of Crawley) or urbanised land. Land around the potential development area south of Crawley also contains some non-agricultural land, while the potential development area identified at Copthorne has been designated as Grade 4 agricultural land. Given that development may result in the loss of land which is designated as Grade 3 agricultural land, the potential loss of this good quality agricultural land during any development means that a minor negative effect is expected on **SA objective 7** for Options 20 and 21. As there is potential to locate development on land of lesser agricultural value (Grade 4 agricultural and non-agricultural lands) the minor negative effect of these two options is recorded as uncertain. Option 22 will not result in the loss of any agricultural grade land as it will not require further housing to be built. A negligible effect is recorded for this option.

The broad locations for development are in areas which potentially may have a negative effect on **SA objective 8** either through development of Wealden's unmet housing need itself resulting in the loss of or damage to habitats or through disturbance to species as a result of the development. Development between Cuckfield and Hayward Heath would potentially have a negative effect on Blunts Wood and Paige Wood a Local Nature Reserve and Site of Nature Conservation Importance. To the north part of the District the potential development areas south and east of



Crawley, as well as Crawley Down, Copthorne and East Grinstead could have a detrimental effect on Ashdown Forest SAC and SPA which are sensitive to air pollution (significantly acid deposition and eutrophication by nitrogen deposition)<sup>30</sup>. If the District was to accept some or even all of the Wealden's unmet housing need as specified in Options 20 and 21 (which would require 2,490 or 1,245 homes to be built north of the AONB) an increased number of commuter journeys by car could result to these northerly potential development locations particularly from the settlements of Uckfield and Crowborough to the east in Wealden with new residents potentially still having jobs at Wealden's employment sites. A 7km zone of influence around Ashdown Forest has also been established given that the majority of visitors to the Forest travel from the nearby vicinity. Bird species are vulnerable to disturbance by visitors, and as East Grinstead and Crawley Down are within this zone of influence a negative effect is expected on this SA objective if Option 20 or Option 21 is chosen. Considering that alternative sites may be found within the potential development locations the negative effect is thought to be uncertain. As Option 22 would not result in an increase in the number of houses in the District a negligible effect is expected for this option.

Options 20 and 21 are likely to have a mixed effect on **SA objective 9**, as although some of the broad potential development locations that could be used to meet Wealden's unmet need are directly adjacent to the nationally protected landscapes of The High Weald AONB (area surrounding Haywards Heath, Cuckfield, the area east of Crawley, East Grinstead and Crawley Down), the potential development location south of Crawley is within the AONB itself. Additional development at these locations which border the AONB may have a detrimental effect on the setting of these landscapes and the potential development location south of Crawley will significantly impact upon the AONB through loss of designated land to development. These locations would however provide easy access for residents to high quality green space. Considering these issues a minor positive and negative effect are expected for options 20 and 21 given the high level of development specified. The effect on this SA objective would be more certain if the specific location of development was known. As Option 22 would not result in the need for additionally housing provision in the Mid Sussex District the effect upon nationally protected landscapes is negligible.

The potential development location at Haywards Heath could potentially be constrained by and have impacts upon seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Cuckfield has two conservation areas which may be impacted upon by any development: the central Cuckfield and Whitemans Green conservation area to the north west. In East Grinstead development may be constrained by the East Grinstead conservation area and Estcots and East College Lane conservation area in the centre of the settlement. Given that design and location of future development is unknown at this stage mixed uncertain effects are noted for Option 20 and Option 21 which would result in additional housing. Any development has the potential to negatively or positively impact on the setting of heritage features depending on its location and design. The effect on **SA objective 10** remains uncertain as the location and design of the development is unknown. As option 22 would not result in an increase in the number of houses in the District a negligible effect is expected for this option.

The acceptance of 100% of and 50% of Wealden's unmet housing needs under Option 20 and Option 21 may result, at least initially, in increased levels of commuting between the two districts as new residents may still be employed in Wealden. It is noted that there are strong public transport (rail) connections between the existing settlements in the District. Both Haywards Heath and East Grinstead both have at least one train station. However, these connections run south to Brighton and Hove and north to Crawley and then London and not directly to Wealden to the east. In general, public transport links between Wealden and Mid Sussex are weak; particularly connections to the south of the District given that a direct train link is lacking and only irregular bus services exist to Uckfield in the east of Wealden. As such an increase in car use might be

<sup>30</sup> Habitats Regulations Assessment for the Mid Sussex District Plan, May 2013, UE

expected with regards to any potential commuting to Wealden District from those who have recently relocated to Mid Sussex. Considering travel to work information more people commute from Wealden to Mid Sussex than Mid Sussex to Wealden with a net flow of 1,017 in the direction of Mid Sussex showing the strong commuting link between the authorities. The provision of housing in Mid Sussex to meet Wealden's unmet housing need may result in a decrease of commuting across the District boundary if these houses were taken up by previous in-commuters from Wealden to Mid Sussex. However, the potential for a reduction in congestion in the District is thought to be minimal. As previously noted any increase in journeys by private car may have a detrimental effect on the SPA and SAC at Ashdown Forest due to increased air pollution. Additionally, the potential development locations of Cuckfield, Copthorne, Crawley Down, and the areas south and east of Crawley do not currently have any immediate access to train transport. However the road network in the District is highly developed between settlements with the A23 providing access good north to south and the A272 providing access east to west. As such mixed effects may be expected on **SA objective 11** for all options except option 22 which would have a negligible effect as no new houses would be provided in the District.

The location of additional housing should not have an effect on **SA objective 12**, i.e. the level of waste produced, re-used or recycled per householder. . However if the District was to accept all or half of Wealden's unmet housing needs as specified in Option 20 and Option 21 (3,320 and 1,660 houses respectively) it would most likely lead to an increase in the amount of waste the District as a whole would produce. As such a minor negative effect is expected to result on this SA objective if Option 20 or Option 21 is implemented. Given that no additional housing is required in option 22 a negligible effect is expected on SA objective 12. The effect on this SA objective is uncertain as mitigating increasing levels of waste production may be possible through improved recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Given the overall existing pressure on the Districts water supply and water quality it is recognised that increases in housing within the District (as detailed by Option 20 and Option 21) could have a negative effect on **SA objective 13**. Option 22 will result in no new housing in Mid Sussex and such as a negligible effect is anticipated in this final scenario.

**SA objective 14** of increasing energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex will not be affected by accepting more or less of Wealden's unmet housing need. Proceeding with Option 21 or Option 22 which will lead to higher levels of housing being provided may result in an overall increase in demand on energy production however and therefore a minor negative effect is expected on this SA objective for these options. As Option 22 will not lead to an increase in housing provision in the District a negligible impact is expected on the SA objective.

#### Economic:

As all three options include potential development areas around existing town centres (Cuckfield, Crawley Down, Copthorne, East Grinstead, Haywards Heath and the area east of Crawley) and to a varying degree will lead to the number of households within walking distance of a town centre (with the exception the location south of Crawley) being increased, a minor positive effect is expected on **SA objective 15** for Option 20 and Option 21. As Option 22 will not result in the provision of additional homes in Mid Sussex a negligible effect is expected in this scenario.

Option 20 and Option 21 will have a minor positive effect on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Cuckfield, Crawley Down, Copthorne, East Grinstead, Haywards Heath and the area east of Crawley) where existing employers are based. Only the potential development location to the south of Crawley will not have immediate access to employment sites; although it is likely that new employment

opportunities would be provided within the new settlement, in the short term, new residents would probably have to commute further afield for employment. As Option 22 will not result in the provision of additional homes in Mid Sussex a negligible effect is expected in this scenario

The development of housing creates the potential for job provision and additionally may generate demand for services. At the levels of housing provided for in Option 20 and Option 21 it is not expected that a lack of provision of additional employment land within the District should negatively affect sustainable economic growth in the District. As such a minor positive effect is expected on **SA objective 17** for Option 20 and Option 21. A negligible effect is expected for Option 22 as it would not provide more housing in the District.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Wealden's unmet housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

#### **Overall Conclusion:**

Options 20 and 21 would have mainly minor sustainability effects as despite providing for either all or half of Wealden's unmet housing requirements, the amount of additional housing under both options is lower than 5,000. Option 22 would not contribute to any of Wealden's unmet housing need, and therefore would have negligible effects on all SA objectives except for a minor negative effect on SA objective 1, due to the lack of provision of any housing. Conversely, Option 20 (meeting all of Wealden's unmet need) would have a significant positive effect on SA objective 1. There could be a number of potentially negative effects particularly on environmental receptors if Mid Sussex District were to deliver all or half of Wealden's unmet housing need. However, a number of these effects could be avoided depending on the specific location of the additional dwellings required. In addition, there could be pressure placed on existing schools within East Grinstead and Haywards Heath unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements.

Options:																			
<p><b>23:</b> Meet all Worthing's unmet need (7,500 houses)</p> <p><b>24:</b> Meet 50% of Worthing's unmet need (3,750 houses)</p> <p><b>25:</b> Meet Worthing's unmet need based on Internal Migration data (-70 houses: no contribution to unmet need)</p>																			
<p>Broad potential locations for development:</p> <ul style="list-style-type: none"> <li>• Around Haywards Heath/Lindfield</li> <li>• Around Burgess Hill</li> <li>• Around Hurstpierpoint/Hassocks</li> <li>• New settlement/ Sayers Common</li> </ul>																			
Option	Social					Environmental								Economic					
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Community Cohesion	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Sustain Economic Growth	18 – Encourage Tourism	
23	++	+	+/- ?	+	++/-	--?	--?	--?	+/- ?	+/-	--	--?	--	--	++	++	+/-	0	
24	+	+	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/-	--	-?	-	-	+	+	+	0	
25	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

## Summary of Appraisal:

### Social:

Development proposals which would provide additional housing in the District to meet Worthing District's needs are expected to have a positive effect on **SA objective 1**. If Mid Sussex District meets all of Worthing District's housing needs (Option 23) a significant positive effect is expected on this SA objective given the high number of houses specified (7,500) and considering that the shortfall in housing will be entirely satisfied. If Mid Sussex was to meet 50% of Worthing District's housing needs (Option 24 – 3,750 dwellings) a minor positive effect is expected. Although a large number of houses are proposed in this option, half of Worthing's housing need remains unmet. Option 25 provides that Mid Sussex meet's Worthing's need based on past Internal Migration data which would not provide any additional houses to meet Worthing's unmet need, therefore, a minor negative effect is expected on this SA objective. For all options the effect would be more positive if a provision is made for the delivery of affordable housing. In practice Option 23 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

The effect expected on **SA objective 2** will depend on the specific sites chosen for development. Any of the options which lead to an increase in housing provision will have a minor positive effect on this SA objective as the broad locations around the existing urban areas of Hurstpierpoint, Burgess Hill and Haywards Heath already provide nearby access to multiple health services, as well as leisure and open space facilities. The potential new market town development near Sayers Common however is not within proximity of existing health facilities. The overall effect for Option 23 and Option 24 is therefore an uncertain minor positive; the effect would be more positive if it was known whether or not any developments would include any new health facilities or improvements to existing facilities and additionally if they would include any financial contributions towards leisure facilities. The effect is noted as uncertain as the exact location of development is unknown at this stage. Option 25 would not lead to the need for more housing in Mid Sussex and therefore a negligible effect is expected on this SA objective.

Varying levels of pressures on primary and secondary school facilities have been identified if any large scale development was to take place in Hurstpierpoint, Haywards Heath and Burgess Hill<sup>31</sup>. The potential new market town development near Sayers Common would provide nearby access to a school for children with learning difficulties but no other educational facilities are currently provided at this location. As such given that current access to schools varies between good (at Hurstpierpoint, Haywards Heath and Burgess Hill) to poor (at the potential new market town development near Sayers Common) then development at these sites could have a negative effect on access to schools, due to increases in population leading to an increase in pressure for school places. This could be significant under Option 23 as it would need to provide 7,500 homes. Option 25 would not provide any additional dwellings in Mid Sussex and is considered to have a negligible effect on pressure for school places in the District. This option would also not lead to more houses being built in close proximity to education facilities and therefore a negligible effect is expected on **SA objective 3** for this option. Considering the increase in pressure on access to schools in the area (many of which are already close to capacity) and the numbers of new residents who would be closer to education facilities in Mid Sussex that would result from Option 23 and Option 24 mixed effects are predicted for these options. The effect would be more certain if it was known if development would result in any additional education facilities for example through developer contributions.

The potential development locations in Hurstpierpoint, Haywards Heath and Burgess Hill will provide good access to retail and community facilities as they are within existing urban areas. Dwellings provided at the potential new market town development near Sayers Common would not

<sup>31</sup> Capacity of Mid Sussex District to accommodate development, June 2014, LUC



be in close proximity to an existing town centre or community facilities. Residents here would be likely to travel to nearby settlements to access such facilities although it should be noted that new facilities may be delivered as part of the potential new market town development near Sayers Common. Overall a minor positive is expected on **SA objective 4** is expected from Option 23 and Option 24 which would provide significant numbers of houses in close proximity to retail and community facilities. Option 25 would have a negligible effect on this SA objective as it would not provide any additional houses in the Mid Sussex District.

Option 23 and Option 24 provide for housing at Haywards Heath, Burgess Hill and Hurstpierpoint as well as at the near market town near Sayers Common. The Mid Sussex District Plan 2014-2031 Consultation Draft has identified Haywards Heath and Burgess Hill as towns, while Hurstpierpoint is recognised as a village and any settlements of smaller sizes are identified as small villages. It is considered that the provision of additional housing in close proximity to a town will have a positive effect on community cohesion given that a high demand for additional housing from those who already live in the area may exist. Provision of housing around a settlement of this size would encourage local families not to leave the area thus promoting community cohesion. In contrast given the relatively low populations at the settlement identified as villages and smaller villages it is thought that the provision of high numbers of homes would be of detriment to community cohesion, as there would be a lesser demand for housing here and additionally a negative effect would result on the character of these smaller settlements. It is expected that Option 23 which provides for 7,500 homes would have an equally significant positive and negative effect on this SA objective given that it provides for high numbers of houses around both larger towns and smaller villages. Option 24 provides for 3,750 homes similarly provides these homes around larger towns and smaller villages and given the relative reduction in levels of housing provided a minor positive effect is expected on **SA objective 5**. A negligible effect is expected on this SA objective for Option 25 as it will not result in the provision of additional homes in the District.

#### Environmental:

All of the potential development locations identified for meeting Worthing's housing needs include areas at high risk of flooding (Flood Zone 3). Therefore, the level of additional homes to be provided under any of the options could have a negative effect on **SA objective 6**, although this is uncertain until specific development locations are known. However, it is likely that specific development sites could be found around Hurstpierpoint, Haywards Heath, Burgess Hill and the potential new market town development near Sayers Common which are not in Flood Zone 3, although this would be more difficult under Option 23 due to the higher number of homes, therefore Option 23 is considered likely to have a significant effect. As no additional housing would be provided in the Mid Sussex District if Option 25 was chosen a negligible effect is expected on this SA objective.

The potential development locations considered will mainly result in the loss of greenfield land either around existing settlements (Hurstpierpoint, Hayward Heath and Burgess Hill) or at the potential new market town near Sayers Common. The areas identified are located mainly on Grade 3 agricultural land or have already been urbanised. Land within a potential development location to the south west of Hurstpierpoint has been designated as Grade 2 agricultural land. Given that this is the best and most versatile agricultural land in the District (there is no Grade 1 land in the District), the potential loss of this land during any development means that a negative effect is expected on **SA objective 7**, and this could be significant under Option 23 as it may be more difficult to avoid the loss of Grade 2 land. As the area Grade 2 agricultural land is quite small and development might be situated in other areas where it would not affect the appropriate use of this land the negative effect is uncertain. Option 25 will not result in the loss of any agricultural

grade land as it will not require further housing to be built, and therefore is likely to have a negligible effect.

The broad locations for development of Worthing's unmet housing need are in areas which potentially may have a negative effect on **SA objective 8** either through development itself resulting in the destruction of habitats or through disturbance to species as a result of the development. There are a number of sites of nature conservation importance (SNCIs) and within the broad locations around Haywards Heath, Burgess Hill and south of Hurstpierpoint (e.g. Costells and Henfield and Nashgill Woods - Scaynes Hill to the east of Haywards Heath and Catts Wood Complex and Meadows and Orchard Wood to the west, Big Wood and Valebridge Pond to the north and Keymer Tile Works to the east of Burgess Hill, and Lag Wood and Butcher's Wood to the south of Hurstpierpoint). The Ashdown Forest 7km HRA Buffer acts as a constraint to the northern part of the area around Haywards Heath. The potential new market town near Sayers Common is in close proximity to a number of small pockets of ancient woodland (Laundry Wood, Collins Barn Shaw and Paddock Wood) which may constrain development given that there must be a 15m buffer between this biodiversity feature and new development. Overall, significant and minor negative effects respectively are expected on SA objective 8 for Options 23 and 24 given the numbers of dwellings proposed in these options (7,500 and 3,750), therefore, it may be difficult to avoid increased disturbance or damage to sensitive habitat locations within the broad locations identified. As development might be located within the potential development locations but away from noted biodiversity features a degree of uncertainty is attached to these effects. Option 25 would not result in an increase in the number of houses in the District and therefore a negligible effect is expected for this option.

Option 23 and Option 24 are likely to have mixed effects on **SA objective 9**, as some of the broad potential development locations are directly adjacent to the nationally protected landscapes of The High Weald AONB (areas surrounding Haywards Heath) and the South Downs National Park (areas surrounding Hurstpierpoint and Burgess Hill). Additional development at these locations may have a detrimental effect on the setting of these landscapes. These locations would however provide easy access for residents to high quality green space and as such positive and negative effects are expected for Option 23 and Option 24 given the high level of development specified. The negative effect is more likely to be significant for Option 23 due to the higher number of homes to be accommodated. The potential new market town development near Sayers Common is not in close proximity to any nationally protected landscape areas but would provide new residents ease of access to the wider countryside given that it is not located within an excessively urbanised area. The effect on this SA objective would be more certain if the specific location of development was known. As Option 25 would not result in the need for additional housing provision in the Mid Sussex District the effect upon the nationally protected landscapes is negligible.

The potential development location at Haywards Heath could potentially be constrained by seven conservation areas – to the east Muster Green, Lucastes and Mill Hill Close; to the north the Heath; to the west Lindfield and Lewes Road; and Franksland Village which is located towards the centre of the settlement. Similarly development at Burgess Hill has the potential to impact upon Silverdale Road/ Birchwood Grove Road, St John's and Fairfield conservation areas. Potential development around the Hurstpierpoint may be constrained by the conservation areas at Keymer, Hurst Wickham, Hurstpierpoint centre, and Langton Lane. The potential new market town near Sayers Common would be unaffected by heritage constraints in the Mid Sussex District, however, there are some listed buildings located in close proximity to the wider development location for the new market town within Horsham District. Given that design and location of future development is unknown at this stage, mixed uncertain effects are noted for Option 23 and Option 24 which specify large numbers of additional housing, although the potential negative effect is likely to be more significant under Option 23. Any development has the potential to negatively or positively effect on the setting of heritage features depending on its location and design. The effect on **SA objective 10** remains uncertain as the location and design of the development is unknown. As

Option 25 would not result in an increase in the number of houses in the District a negligible effect is expected for this option.

The acceptance of all of or half of Worthing's housing needs may result, at least initially, in increased levels of commuting between the two districts as new residents may still be employed in Worthing. It is noted that there are strong internal public transport (train) connections between the existing settlements and broad potential development locations surrounding Haywards Heath, Burgess Hill and Hurstpierpoint with each location having at least one train station. These connections run directly south to The City of Brighton and Hove however and not directly to Worthing to the south west. Given the relatively long distance between the two authorities (Worthing is approximately 16km from the nearest potential development site of the new market town at Sayers Common) an increase in car use might be expected with regards any potential commuting to Worthing District from those who have recently relocated to Mid Sussex. In addition to this the potential new market town near Sayers Common is unlikely to have a good public transport infrastructure in the early stages of the development. There is also one AQMA in the District and it is located within the potential development location at Hurstpierpoint at the crossroads of Hurst Road, Keymer Road, Brighton Road and London Road, Hassocks. Development at this location will impact negatively upon air pollution in the District. As such a minor negative effect given the District's good internal transport links but also considering the poor links to Worthing a negative may be expected on **SA objective 11** for Options 23 and 24, while Option 25 would have a negligible effect as no new houses would be provided in the District. Option 23 is expected to have a significant negative effect on this SA objective due to the increased numbers of housing provided.

The location of additional housing should not have an effect on the level of waste produced, re-used or recycled as stipulated by **SA objective 12**. However if the District was to accept a significant amount of Worthing's unmet housing needs as specified in Option 23 it would most likely lead to an increase in the amount of waste the District as a whole would produce. As such a significant negative effect is expected to result on this SA objective if Option 23 is implemented, with a minor negative effect from Option 24. Given that no additional housing is required in Option 25 a negligible effect is expected on SA objective 12 in this scenario. The effect on this SA objective is uncertain as mitigating increasing levels of waste production may be possible through recycling schemes, provision of space within new dwellings for storage of recyclables etc.

Given the existing pressure on the District's water supply and water quality it is recognised that significant increases in housing the region (as proposed under Option 23 ) will have a significant negative effect on **SA objective 13**, while Option 24 could have a minor negative effect. Given that Option 25 will result in no new housing in Mid Sussex a negligible effect is anticipated in this scenario.

**SA objective 14** of increasing energy efficiency and use of sustainable products per household as well as making use of renewable energy installations in Mid Sussex is unlikely to be affected by accepting more or less of Worthing's unmet housing need. However proceeding with Option 23 or Option 24 which will lead to considerably higher levels of housing (7500 and 3750 dwellings respectively) being provided may result in an overall increase in demand on energy production; therefore significant and minor negative effects respectively are expected for these options, but a negligible effect for Option 25. .

#### Economic:

As all options include areas around existing town centres (Hurstpierpoint, Haywards Heath and Burgess Hill) and to a varying degree will lead to the number of households within walking distance of a town centre (with the exception the potential new market town development near Sayers Common) being increased, significant and minor positive effects are expected on **SA objective 15** for Option 23 and Option 24 respectively. As Option 25 will not result in the provision of additional

homes in Mid Sussex a negligible effect is expected in this scenario.

Options 23 and 24 will have a significant and minor positive effect respectively on **SA objective 16** due to most of the proposed areas of development being near existing urban areas (Hurstpierpoint, Haywards Heath and Burgess Hill) where employers are based. Only the potential new market town development near Sayers Common will not have immediate access to employment sites; although it is likely that new employment opportunities would be provided within the new settlement, in the short term, new residents would probably have to commute further afield for employment. As Option 25 will not result in the provision of additional homes in Mid Sussex a negligible effect is expected in this scenario

Option 23 provides for a high level of housing in the District (7,500). Although housing development is an economic activity which has potential to create job opportunities and increase the demand for services in the District it is also expected that without the provision of additional employment land within the District a negative effect on sustainable economic growth will result given that businesses required to provide job opportunities to new residents will not have the space to expand. As the number of houses provided for in Option 24 is reduced in comparison a minor positive effect is expected on **SA objective 17** as it is thought that providing this level of housing will not put pressure on the demand for employment in the District. Option 25 will not provide for any additional housing in the District and as such a negligible effect is expected on this SA objective.

The effect of all options on **SA objective 18** is expected to be negligible as the satisfying of Worthing's housing needs to varying levels should not impact upon the development of a buoyant, sustainable tourism sector in the Mid Sussex District.

#### **Overall Conclusion:**

Despite making a significant contribution to meeting Worthing's unmet housing need, there could be a number of potentially significant negative effects on environmental receptors if Mid Sussex District were to deliver all of Worthing's unmet housing need (Option 23). Some of these effects might be able to be avoided or mitigated depending on the specific location of the additional dwellings required, however, the number of new homes to be delivered would mean almost 75% more homes would be developed than already planned for to meet Mid Sussex's own needs (i.e. 7,500 on top of the 10,600 in the Submission District Plan). In addition, Option 23 could put pressure placed on existing schools within East Grinstead, Crawley Down and Copthorne unless new schools were provided to help meet the increased requirement from delivering additional homes around these settlements. Effects would be similar but more minor under Option 24, and negligible under Option 25, as it would not result in any additional homes within Mid Sussex. As it would not make any contribution to Worthing's unmet housing need, it would have a minor negative effect on SA objective 1 (provision of housing).