

5. Sustainability Framework - Objectives and Indicators

Task A4 – Developing the Sustainability Appraisal / SEA Objectives

- 5.1. In order to assess the contribution the consultation draft District Plan will make towards achieving sustainable development, a range of sustainability objectives were developed. These objectives are based on the three strands of sustainability: **Social**, **Economic** and **Environmental**. The sustainability objectives have been developed in order to provide a mechanism to measure the extent the District Plan achieves these three aims of sustainability.
- 5.2. Each objective is quantified by a number of measurable indicators which can be monitored over time to ensure the strategy and policies within the District Plan are performing as predicted by the appraisal, once adopted. The objectives and indicators make up the „Sustainability Framework“.
- 5.3. The objectives chosen represent the issues and challenges facing the District throughout the plan period. The indicators have been chosen to provide the best possible sources in order to quantify and measure the achievement of each objective. Appendix 2 shows the current baseline figures for as many indicators as possible, plus the data source from where this has been obtained. Where it is not currently possible to obtain data for an indicator, a reason has been provided. The Council will be investigating ways to collect this data in future, and progress on this will be reported in future stages of this Sustainability Appraisal report.
- 5.4. When appraising the strategy and policies within the consultation draft District Plan, an assessment will be made as to their predicted impact on the Sustainability Framework. The impact of the policy on each objective will be scored accordingly - a prediction as to whether the baseline status of each objective will improve, stay the same or get worse as a result of the policy in question.
- 5.5. The Sustainability Framework was consulted upon at the Scoping Report stage and refined following this consultation. Objectives specific to Strategic Environmental Assessment are denoted by „SEA“ following the objective name.
- 5.6. The sustainability objectives and their corresponding indicators are:

Social	1	To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.
		<ul style="list-style-type: none"> - <i>housing completions per annum (net);</i> - <i>number of affordable homes completed annually (gross);</i> - <i>number of dwellings built to Code for Sustainable Homes standard;</i> - <i>number of households accepted as full homeless;</i> - <i>private dwellings made fit or demolished;</i> - <i>financial contributions towards affordable housing provision;</i> - <i>number of key worker households delivered annually.</i>
Environmental	2	To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere, thereby minimising the detrimental impact to public well-being, the economy and the environment from flood events. (SEA)
		<ul style="list-style-type: none"> - <i>number of properties at risk from flooding, as defined by the Environment Agency;</i> - <i>number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds.</i>

Social	3	To improve the access to health facilities and reduce inequalities in health.
		<ul style="list-style-type: none"> - number of applications resulting in the loss of health facilities; - number of applications resulting in new, extended or improved health facilities; - percentage of new dwellings within 300 metres of accessible greenspace; - percentage of new residential developments within 30 minutes public transport time of a GP, hospital or major health centre.
Social	4	To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and increase access to educational facilities.
		<ul style="list-style-type: none"> - percentage of population of working age qualified to NVQ level 3 or equivalent; - percentage of adults with poor literacy and numeracy skills; - percentage of new residential developments within 30 minutes public transport time of a primary and secondary school.
Social	5	To create crime resistant communities
		<ul style="list-style-type: none"> - all crime – number of crimes per 1000 residents per annum; - number of domestic burglaries per 1,000 households. - number of developments achieving „Secured by Design“ status
Social	6	To improve accessibility to retail and all community services and recreation and leisure facilities.
		<ul style="list-style-type: none"> - average distance the population of the District live from key services (Post Offices, local shops, recreation and leisure facilities); - amount of leisure floorspace (Use Class D2) completed per annum (gross) - financial contributions towards leisure facilities.
Environmental	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"> - percentage of new homes developed on brownfield land; - percentage of new employment floorspace on previously developed land; - density of new housing developments; - number of developments using reclaimed/recycled materials in construction; - amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development.
Environmental	8	To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts. (SEA)
		<ul style="list-style-type: none"> - number of properties at risk from flooding, as defined by the Environment Agency; - number of developments built to BREEAM/Code for Sustainable Homes standards; - number of developments incorporating water efficiency measures; - proportion of journeys to work by public transport; - percentage of electricity consumed that is generated from renewable energy sources.

Environmental	9	To conserve and enhance the District's biodiversity. (SEA)
		<ul style="list-style-type: none"> - <i>condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar);</i> - <i>number and area of SNCIs and LNRs within the District;</i> - <i>area of ancient woodland within the District;</i> - <i>change in priority habitats and species;</i> - <i>number of planning applications approved contrary to advice given by Natural England on biodiversity issues.</i>
Environmental	10	To protect, enhance and make accessible for enjoyment, the District's countryside. (SEA)
		<ul style="list-style-type: none"> - <i>open spaces managed to green flag standard;</i> - <i>number of major developments in the South Downs National Park / High Weald AONB;</i> - <i>proportion of development in areas of high capacity in landscape terms;</i> - <i>net gain/loss of Rights of Way;</i> - <i>percentage of new dwellings within 300 metres of accessible greenspace.</i>
Environmental	11	To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)
		<ul style="list-style-type: none"> - <i>buildings of Grade I and II* and scheduled monuments at risk;</i> - <i>number of Conservation Areas with appraisals and management proposals;</i> - <i>number of Listed Buildings in the District.</i>
Environmental	12	To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car.
		<ul style="list-style-type: none"> - <i>monetary investment in sustainable transport schemes (value of s.106 agreements);</i> - <i>number / percentage of permissions that have a green transport plan;</i> - <i>proportion of journeys to work by public transport;</i> - <i>percentage of new residential development within 30 minutes public transport time of a GP, primary and secondary school, employment and a major health centre.</i>
Environmental	13	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.
		<ul style="list-style-type: none"> - <i>percentage of domestic waste that has been recycled;</i> - <i>percentage of domestic waste that has been composted;</i> - <i>number of developments incorporating new recycling facilities;</i> - <i>number of developments using reclaimed/recycled materials in construction.</i>

Environmental	14	To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)
		<ul style="list-style-type: none"> - <i>percentage of stretches of watercourse that are compliant with River Quality Objectives;</i> - <i>number of developments incorporating water efficiency measures;</i> - <i>per capita consumption of water;</i> - <i>incidents of major and significant water pollution within the District;</i> - <i>number of planning applications approved contrary to advice given by the EA on water quality issues;</i> - <i>number and area of developments where appropriate remediation of contaminants has taken place.</i>
Environmental	15	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.
		<ul style="list-style-type: none"> - <i>number of developments built to BREEAM/ Code for Sustainable Homes standards;</i> - <i>domestic energy consumption per household;</i> - <i>percentage of electricity consumed that is generated from renewable energy sources.</i>
Economic	16	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.
		<ul style="list-style-type: none"> - <i>unemployment;</i> - <i>average weekly income for those who are employed in the District;</i> - <i>number of new businesses setting up in the District.</i>
Economic	17	To sustain economic growth and competitiveness across the District.
		<ul style="list-style-type: none"> - <i>amount of employment land lost to residential development;</i> - <i>GVA (Gross Value Added) per capita;</i> - <i>net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace.</i>
Economic	18	To encourage the development of a buoyant, sustainable tourism sector.
		<ul style="list-style-type: none"> - <i>percentage of jobs in the tourism sector;</i> - <i>number of visitors staying overnight.</i>

5.7. The SEA directive makes a requirement for specific objectives on Soil and Air Quality. In analysing the baseline for the District it has not been considered that there are District-wide issues concerning these two areas. It has been difficult to obtain any relevant up-to-date information on these issues at a District-wide scale. For this reason, it has not been possible to include specific objectives for soil and air quality, however there are indicators related to Soil in objective 7 (development on previously developed land and best and most versatile agricultural land) and 14 (contaminated land) and Air Quality in objective 12 (reduction in transport congestion) and 15 (reduction in unsustainable energy that can lead to poor air quality).

- 5.8. The amount of Best and Most Versatile agricultural land within Mid Sussex is reported in Section 4 and Appendix 2, however there are issues related to the collection of this data which are explained in the appendix. For this reason, it cannot be reported accurately and therefore an objective on this issue would be difficult to monitor with any accuracy.
- 5.9. There are no Air Quality Management Areas (AQMA) in the District although there are issues with atmospheric pollution that could affect the Ashdown Forest SPA/SAC. It is not anticipated that the strategy and policies within the consultation draft District Plan will affect the numbers of AQMAs in the District, however if this status changes, and it is deemed necessary to include an objective for air quality, one can be included in the next stage of this report.

Task B1 – Testing the District Plan Objectives against the Sustainability Appraisal / SEA Objectives

District Plan Objectives

- 5.10. The consultation draft District Plan sets out a number of strategic objectives. These are important as they state what the District Plan is aiming to achieve through its overall strategy and accompanying policies. The strategic objectives have been chosen in order to help solve or mitigate as many of the issues and challenges for the District as possible through the planning system.
- 5.11. An assessment has been made as to whether the 14 District Plan objectives are consistent with the 18 objectives of the Sustainability Appraisal, as identified earlier in this section. This exercise helps to identify where potential areas of conflict lie, and where mitigation may be required.
- 5.12. The following are the 14 strategic objectives for the consultation draft District Plan:

Priority themes	Strategic Objectives for the District Plan
Protecting and enhancing the environment	<ol style="list-style-type: none"> 1. <i>To promote sustainable development that makes the best use of resources and increases the „self-sufficiency“ of communities within Mid Sussex, and its ability to adapt to climate change</i> 2. <i>To promote well located and designed development that reflects our distinctive towns and villages, retains their separate identity and character and prevents coalescence</i> 3. <i>To protect valued landscapes for their visual, historical and biodiversity qualities</i> 4. <i>To maintain easily accessible green corridors and spaces around and within the towns and villages to act as wildlife corridors and sustainable transport links</i> 5. <i>To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that meet needs, supports development and creates sustainable communities</i>
Promoting economic vitality	<ol style="list-style-type: none"> 6. <i>To promote a place which is attractive to business, and where local enterprise thrives</i> 7. <i>To provide opportunities for people to live and work within their communities, reducing the need for commuting</i> 8. <i>To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community</i> 9. <i>To support a healthy rural economy in the villages and the countryside</i> 10. <i>To support and enhance the attractiveness of Mid Sussex as a visitor destination</i>

Ensuring cohesive and safe communities	<p>11. To develop sustainable communities which are safe, healthy and inclusive.</p> <p>12. To provide the amount and type of housing that meets the needs of all sectors of the community</p> <p>13. To create environments that are accessible to all members of the community</p>
Supporting healthy lifestyles	<p>14. To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.</p>

Table 7: District Plan Objectives

5.13. These have been assessed for compatibility with the 18 Sustainability Objectives in Table 8 below:

		District Plan Objectives													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Sustainability Objectives	1	✓		✗	✗		✓	✓	✓			✓	✓		
	2				✓	✓									
	3	✓		✓	✓	✓						✓	✓	✓	✓
	4	✓				✓	✓					✓	✓	✓	
	5		✓									✓		✓	
	6	✓				✓	✓		✓	✓		✓	✓	✓	✓
	7	✓							✓				✓		
	8	✓				✓		✓							
	9			✓	✓								✗		
	10	✗		✓	✓	✗	✗				✗	✓	✗	✗	✓
	11		✓	✓	✓						✓			✓	
	12				✓	✓		✓		✓					✓
	13					✓									
	14														
	15	✓				✓									
	16	✓						✓	✓	✓	✓				
	17	✓		✗				✓	✓	✓	✓	✓		✓	
	18	✓						✓	✓	✓	✓	✓			✓

Key:

✓	Compatible
✗	Incompatible
	No link / Neutral

Table 8: Compatibility between District Plan and Sustainability Appraisal Objectives

5.14. As the table demonstrates, most of the District Plan objectives and Sustainability Appraisal objectives are compatible with one another, or have a neutral impact. The high number of compatible objectives shows that the consultation draft District Plan is being prepared positively with regards to solving some of the sustainability issues identified, and that the Sustainability Objectives are appropriate to measure the extent to which it does.

5.15. There are, however, a few areas which are not compatible with each other – in the majority of cases this is where objectives for growth within the District (housing, employment and community facilities) are in conflict with objectives for preserving and enhancing countryside, biodiversity or the historic environment. It is inevitable that conflicts will arise from a plan that is not only facilitating growth, but protecting important environmental assets as well. It will be important that the right balance is struck in the consultation draft District Plan to lay down the framework for growth at the same time as mitigating against any negative impacts this may

have on environmental objectives. Mitigation may be in the form of criteria within policies (for example, development principles for site allocations), or other policies within the District Plan.

Sustainability Objectives

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

2	x																	
3	✓																	
4																		
5	✓			✓														
6			✓		✓													
7	✓	✓																
8	x	✓																
9	x															✓		
10	x	✓					✓	✓	✓	✓								
11							✓	x	✓	✓	✓							
12	x		✓				✓	✓	✓	✓								
13	x							✓	✓	✓						✓		
14	x	✓						✓	✓	✓	✓							✓
15	✓							✓	✓				✓					✓
16	✓	x		✓	✓					x	x							
17	✓	x		✓	✓	✓				x	x							✓
18	x				✓	✓	✓			✓	✓	✓						✓
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18

Key:

✓	Compatible
x	Incompatible
	No link / Neutral

Table 9: Compatibility of Sustainability Objectives

5.17. It is evident that most of the objectives are compatible with each other, or have no link/neutral impact. In a similar way to the comparison between Sustainability/District Plan objectives, cases where objectives are not compatible with one another were where objectives that result in the need for development are compared against those concerned with conserving and enhancing the environment – i.e. the need for development to be minimised (for example, the conflict between objective 1 and objectives 8-14).

5.18. The District Plan will need to contain policies for growth as well as conservation, so it would not be realistic for these objectives to be removed or altered. In appraising the strategy and policies, it is likely that these conflicts will arise. It will be the job of the appraisal to identify where conflicts occur, minimise adverse impacts by promoting the most suitable policy options, and identify mitigation where adverse impacts cannot be avoided.

5.19. As the Sustainability Appraisal is an informing rather than decision-making tool, it has not been considered appropriate to weight the objectives in any way. As the District Plan will contain a wide variety of policies, covering social, environmental and economic aims, assigning weight to objectives for all appraisals is not deemed appropriate due to the very broad range of topics and aims covered by the policies proposed within the District Plan. It is important to remember that, as an informing tool, precisely scoring and weighting the different objectives may move it towards a decision-making tool which is not designed to be.

5.20. In recommending the preferred policy option, weight has been placed on the sustainability objectives most closely linked with the particular policy being appraised at the time, e.g. for a

policy on affordable housing, its impact on the „provision of housing objective“ has been deemed more important than its impact on the „tourism“ objective. Where this has been the case, reference has been made to the decision taken in the conclusion.

Sustainability Framework - Baseline Information

- 5.21. Section 4 of this document presents the overall baseline position for the District, which has helped determine the social, environmental and economic characteristics and challenges for Mid Sussex. In turn, this information helped formulate the Sustainability Framework.
- 5.22. The baseline data for each of the indicators listed above have also been collected for as many indicators as possible. Where it has not been possible for this information to be obtained, reasoning is given. It is important that baseline statistics are from reliable sources, are of a suitable spatial scale (in other words, are for Mid Sussex rather than national or regional figures) and can be collected efficiently without being onerous, as the baseline will need to be re-collected yearly.
- 5.23. This is documented in Appendix 2 and also forms the basis for monitoring the effectiveness of the District Plan upon its adoption. The measures for monitoring are also outlined in Section 7.
- 5.24. An assessment has also been made as to whether the baseline situation relating to each indicator is likely to get better (↑), get worse (↓) or stay the same (→) with and without the strategy and policies within the consultation draft District Plan. Where this is unknown or difficult to assess, this is denoted by „?“.

Policies within the District Plan

- 5.25. In order to meet the strategic objectives for the District Plan and to address some of the issues and challenges for the District that have arisen (through consultation, the evidence base and the collection of baseline information through this Sustainability Appraisal), a range of policy areas have been chosen for inclusion in the consultation draft District Plan. It will be these policy areas that will be appraised in Section 6 to evaluate whether they have a positive or negative impact on the baseline, using the Sustainability Framework to undertake this evaluation.
- 5.26. The table below shows how District Plan objectives, which were based upon the issues and challenges for the District identified by the baseline section of this report, have been met by the range of policy areas to be included within the consultation draft District Plan.

Policy Area	Meets District Plan Objectives
DP1: Economic Development	6, 7
DP2: Retail Development	8
DP3: Housing	All
DP4: General Principles for Strategic Development at Burgess Hill	All
DP5: Strategic Allocation to the East of Burgess Hill at Kings Way	All
DP6: Strategic Allocation to the north and northwest of Burgess Hill	All
DP7: Protection and Enhancement of the Countryside	3
DP8: Preventing Coalescence	2
DP9: Sustainable Rural Development and the Rural Economy	9, 10
DP10: New Homes in the Countryside	3

DP11: High Weald Area of Outstanding Natural Beauty	3
DP12: Ashdown Forest Special Area of Conservation and Special Protection Area	3
DP13: South Downs National Park	3
DP14: Setting of the South Downs National Park	3
DP15: Tourism	9, 10
DP16: Securing Infrastructure	5
DP17: Transport	5
DP18: Rights of Way and Other Recreational Routes	14
DP19: Communication Infrastructure	6, 7
DP20: Leisure and Cultural Facilities and Activities	4, 14
DP21: Community Facilities and Local Services	11
DP22: Character and Design	2, 13
DP23: Accessibility	13
DP24: Noise, Air and Light Pollution	2, 3
DP25: Housing Mix	11, 12
DP26: Affordable Housing	11, 12
DP27: Rural Exception Sites	9, 11, 12
DP28: Gypsies and Travellers	11, 12
DP29: Listed Buildings and Other Buildings of Merit	2, 3
DP30: Conservation Areas	2, 3
DP31: Historic Parks and Gardens	3
DP32: Archaeological Sites	3
DP33: Biodiversity / Protection of Natural Habitats	3, 4
DP34: Sustainable Resources	1
DP35: Renewable Energy in New Developments	1
DP36: Renewable Energy Schemes	1
DP37: Flood Risk	1
DP38: Water Infrastructure and the Water Environment	1

Table 10: District Plan Policy Areas

Future change *without* the District Plan

5.27. In the absence of the District Plan (and as a consequence the lack of a vision and strategy for the District) it is considered that there will be fewer opportunities to address the issues and challenges facing the District as well as contributing to a reduction in the potential benefits to communities. It is clear in the majority of instances that the inclusion of the policies listed above should have a positive impact on the baseline. The effect of „No Plan“ on the sustainability objectives and indicators is outlined in appendix 2 and has led to the following conclusions.

Social and Economic Change

5.28. Subject to the health of the national economy, there is no reason to suggest that the overall economic situation in the District will significantly change. The population of Mid Sussex is predicted to continue to rise in the future and it is likely that Mid Sussex will continue to have an ageing population. For example, by 2031 it is predicted the population of the District will be 149,800 (ONS).

5.29. It is expected that the number of households in Mid Sussex will still increase without the District Plan due to existing allocated and windfall sites, but there is no reason to suggest that the condition of the housing stock will decline. Without the District Plan it is possible that

less favourable locations (in terms of sustainability) could be developed in order to meet the District's housing requirement and maintain a five-year supply of housing.

- 5.30. It is not likely that the overall deprivation in the District would be significantly worsened, although some of the more deprived areas would not have a policy framework in place to address the problems that exist. There is also no indication that crime levels will significantly rise.
- 5.31. In particular, without the District Plan, opportunities for the following issues may be compromised:
- Town centre revitalisation
 - Local employment
 - Housing delivery (especially affordable housing)
 - Infrastructure improvements such as transport, health and education
 - Improvements in open space, sport and recreation facilities

Environmental Change

- 5.32. In the future, climatic factors may impact the ecological and landscape resources in the District such as effects on flora and fauna. The District Plan is able to set policies on climate change mitigation and adaptation, and without these the effects of climate change may be more pronounced. Flood events may be worsened as the District Plan can set out and deliver a holistic approach to sustainable drainage and flood risk management. There is no indication that air quality will deteriorate in the District, although factors outside of the control of the District Plan may impact on air quality, for example, possible expansion of Gatwick Airport. It may become increasingly difficult to direct development towards sites that are either contaminated or of poor agricultural value, so there could be a negative impact on soil quality.
- 5.33. In particular, without the District Plan opportunities for the following issues may be compromised:
- Protecting the integrity and quality of biodiversity assets, particularly those that are not protected by national policy and legislation
 - Creating and enhancing biodiversity and natural habitats
 - Creating and managing green infrastructure
 - Conservation and enhancement of the historic environment
 - Improvements in sustainability such as water efficiency